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ABSTRACT

This report discusses and analyzes federal policies and practices with regard to citizen participation and neighborhood representation in community-based federal programs. Material for the study was gathered through personal interviews with federal management personnel in the Office of Economic Opportunity, the Department of Labor, the Department of Housing and Urban Development, and the Department of Health, Education, and Welfare. All personnel were based in the San Francisco regional office of their respective agencies and were connected to programs which operated at the city level. Section 1 discusses definitions of citizen, of participation, of neighborhood, and of representation. Section 2 examines federal practices with regard to participation in three categories of activity: agencies having legislative or administrative policy calling for citizen participation, the Community Action and Model Cities programs, and agency programs taking cognizance of Community Action or Model City vehicles in order to secure participation. Section 3 comments on the current state of citizen participation policy, as well as recommendations for policy development. (Author/JG)

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CITIZEN PARTICIPATION: A REVIEW AND COMMENTARY ON FEDERAL POLICIES AND PRACTICES

INTRODUCTION

Unlike some of the other areas of Federal urban policy analyzed in the present study, citizen participation policy has evolved without a consensus or even a very clear definition of the problem. In part, the origin of the issue was a perception by social scientists and administrators that lack of involvement in the planning and delivery of social services for the poor and disadvantaged was associated with alienation and seemed to decrease the effectiveness of these programs. In part, the problem was whether and how to meet increasing demands by the poor and disadvantaged for a redistribution of decision-making authority. For others, the problem was how to build an effective political constituency for new social programs benefitting a minority of the population.

However, the problem was perceived at the outset--to increase program effectiveness, to redistribute power, to build an effective political constituency for new programs--the problem has gradually shifted over the past five years from an issue involving individual involvement and participation to a matter of group rights and power vis-a-vis the larger community. Thus the issue is no longer primarily whether and to what extent individual poor citizens are to be involved in planning and delivering social services; but rather, how much control geographic neighborhoods or ethnic minorities (often coterminous) are to have over public programs serving them. Thus citizen participation has

become the problem of community control and decentralization of decision-making power from traditional Federal, state and local government levels to the neighborhood level.

Federal policy is still addressed primarily to the older definitions of the problem, although some programs are being forced to deal increasingly with the newer aspects of group power. Furthermore, there is no agreement in Federal policy or practice on what "citizen participation" itself does or should mean. We know from the field work done in preparation for this paper as well as from personal Federal employment that there are a variety of Federal conceptions with regard to citizen participation. Some of this variety derives from the fact that the term "citizen" has become (in addition to its traditional, legal meaning) a euphemism for those who are poor, black and brown.

Before proceeding to a description of Federal policies and practices we will define citizens and participation. The citizens we have in mind are in two categories: first are those whose current conditions make them the subject for intended benefits under Federal programs; second are those who may be disadvantaged as a result of the use of Federal resources (e.g. slum dwellers and small businessmen in the path of renewal clearance, or farm laborers whose jobs are threatened by "bracero" legislation). Participation can be viewed as an act or a series of acts by which the "citizen" has the opportunity to influence the distribution of benefits or losses which may be visited upon him (or upon those people he represents) as a result of Federally supported activity.

There is a certain loose, unorganized quality about citizen

participation defined in the above manner which is at sharp variance with the kind of participation which has the capacity to share in the governance of cities. In fact it is the absence of this quality which potentially distinguishes citizen participation in the Federal Community Action and Model Cities Programs. Participation in these latter two efforts has focussed great energy on the building of structures which can continuously be concerned with issues of governance as opposed to the transient, single purpose involvement which characterizes almost all other Federal efforts. Federal programs such as Model Cities and the Community Action Program are either concerned with a category of persons (those who are poor) or with persons living within a specified area. The structure for citizen participation in these two programs is in theory meant to provide an on-going vehicle for influencing a redistribution of goods and services to benefit all those who are poor or who reside within the model neighborhood. By this definition, Community Action Agencies and Model City Agencies aspire to become governmental structures able to continuously offer opportunities for influence to their respective constituencies.

The great visibility which the Community Action and Model Cities programs have given to citizen participation should not hide the fact that there is a history and practice in other Federal programs (outside of CAP and Model Cities) which lend themselves to the following categorization: (a) those Federal programs whose administrative guidelines call for "involvement," "participation," "seeking the advice of," but with few clues as to who is to be involved or what form the involvement is to take; and (b) those programs which show interest in

the creation of limited purpose structures (e.g., councils, advisory boards, parent committees) to act as sources of influence over narrowly defined programs (e.g., mental health centers, Head Start Programs, vocational training). Of course, there are many other Federal programs whose administrative guidelines (and legislation) do not reflect any concern with the issue of citizen participation.

The point is that there is no one Federal policy toward citizen participation--there are many policies. The most difficult and salient job for policy analysis is to determine where a profusion of policies is appropriate because of differing program goals, and where a profusion represents timorous administration, confusion as to purpose, and gaps between various Federal agencies.

Given our dual focus on Federal policy and citizen participation, we have attempted to establish that there are varieties of policies and practices which fall under the heading of "citizen participation." At a later point we will offer greater detail as to the varieties of Federal policy. And based upon interviews with Federal officials as well as a reading of Federal agency documents, we will further describe citizen participation, and analyze its component parts.

Other investigators have also looked at citizen participation. In a review entitled "Neighborhood Power and Control," Spiegel and Mittenthal suggest the following types of participation: information, consultation, negotiation, shared policy and decision making, joint planning, delegation of planning responsibility, and neighborhood control. The Oakland Task Force of the San Francisco Federal Executive Board specified a narrower continuum for participation ranging in intensity

from employment,[1/] through dialogue and influence, to control. Of particular use to this study is the Oakland Task Force's attempt to link patterns of participation with particular Federal agencies. Based upon a study of the Office of Economic Opportunity's (OEO) Community Action Agencies, David Austin saw the following activities as components of participation: the organization of advisory committees, holding a series of open community hearings and conferences, community sociotherapy, a union of service consumers, a community corporation through which the neighborhood directly controls a provision of community services, developing political skills and political organizations among citizens who have been ignored by traditional political party structures, a coalition of action organizations in low-income areas, and the urban community based on small, self-contained, self-maintaining, self-directing neighborhoods.

It should be noted that Spiegel and Mittenthal and the Oakland Task Force specified different patterns of citizen participation based upon a variety of Federal program activity. Conversely, Austin developed an even more detailed set of specifications based upon a single Federally-supported activity--the Community Action Agency. In contradistinction to the Oakland Task Force Report, Austin's data suggests that participation varies within a single Federally-supported effort at least as much

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1. Employment in this sense means opening some jobs in public programs to poor and disadvantaged citizens. The jobs may be quite important. But they rate low in terms of citizen participation because those employed cannot formally help shape program policy or represent the interests of their group or neighborhood.

as it does between efforts supported by different Federal agencies. This is not to negate the Oakland Task Force's suggestion that different patterns of participation tend to be associated with different Federal programs. But if Austin's findings with regard to the Community Action Program are correct, there may be a scale-like quality to patterns of participation within a Federally supported program. The notion of scale would imply that the Federal program which facilitates the most intense kind of participation also reflects less intense patterns of participation. This notion of intensity is reflected in the Oakland Task Force scheme and in the Spiegel-Mittenthal paper. One of these papers sees intensity beginning with employment and ending with control. The other sees information activities as the least intense, but agrees that control is the most intense form of participation at the other end of the scale.

It might be useful to fit these ideas of intensity variance in citizen participation, to assumed differences in Federal agency policy. By combining the Spiegel-Mittenthal and Oakland Task Force schemes, one might come up with four measures of intensity (ranging from "least" to "most" intense): (A) employment-information; (B) dialogue-advice-giving; (C) shared authority; (D) control. We have previously suggested four patterns of Federal agency policy: (a) the no-policy program, (b) the program whose guidelines call for involvement or participation without further specification, (c) the program which specifies an advisory or policy body composed of "citizens," (d) the programs which call for citizen participation structures able to deal with an array of issues of governance on a continuing basis.

If the ideas of scale and intensity are valid, the patterns shown in Figure 1 might prevail. The diagram means to suggest that the intensity of citizen involvement in a particular program and the pattern of Federal agency policy are strongly related to each other. The diagram further suggests that Model Cities and CAP (policy "d") would be most likely to reflect control ("D") as a form of citizen participation. Federal programs ("a") without an articulated participation policy would be likely to have the least intensive forms of participation as reflected by category "A" --employment and information.

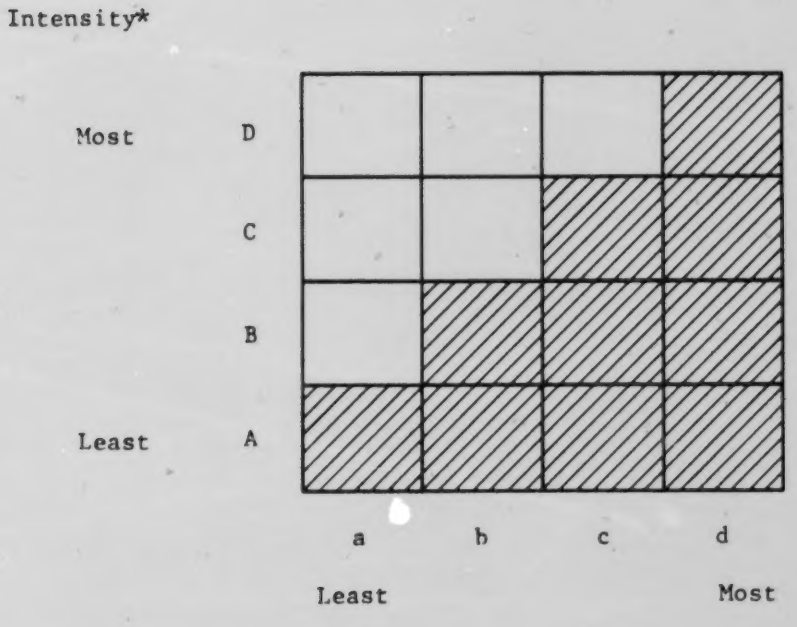
In addition to the idea that intensity of involvement and Federal agency policy vary with each other, there is the unstated assumption that policy precedes--and influences--intensity. This is a most important assumption because it argues that the character of citizen involvement is directly influenced by the character of agency policy. David Austin's data has already suggested that in the CAP program, despite a single national policy, there is a variety in local patterns of participation.

We have so far suggested that the character or intensity of citizen participation is influenced both by local community factors and the character of Federal agency policy. If these appear to be rather obvious causal factors there is yet a third which is equally obvious and equally important. This is the factor of "purpose."

Purpose as a variable influencing the character of citizen participation is difficult to capture. On one level, purpose is apparent or can be inferred from the nature of the laws under which Federal programs operate. But in most Federal programs, purpose, as

FIGURE 1

INTENSITY AND PATTERNS OF CITIZEN INVOLVEMENT
IN FEDERALLY SUPPORTED PROGRAMS



*See text for intensity descriptions A through D and for policy descriptions a through d.

specified in administrative guidelines, becomes more significant than the law itself. One can argue that OEO's guidelines to amplify the legislative language of "maximum feasible participation" were more clear and important as to purpose, than the rather vague language of the law. Daniel P. Moynihan's writings are instructive in this area.

If administrative guidelines both amplify and deflect legislative purpose, it is equally clear that Federal administrators at all levels further amplify and deflect. One astute interviewee in the Department of Housing and Urban Development noted that administrative policy with regard to citizen participation was used as an indulgence. That is, in dealing with localities, the Federal administrator could indulge the community's inattention to citizen participation in return for more adequate performance in other areas. In effect, the purpose of citizen participation policy in such a case was to give the administrator something to trade with.

The variable of purpose has been dealt with carefully and similarly in separate papers prepared by Daniel Fox and the Organization for Social and Technical Innovation (OSTI) for OEO. Virtually identical lists in these papers suggest the following as purposes of citizen participation: (1) decentralizing governmental authority, (2) engineering the consent of the governed, (3) insuring equal protection to individuals and groups through a watchdog citizenry, (4) a form of therapy to cure alienation and other social diseases of our time, (5) employing residents so as to "humanize" services, (6) creating cadres of anti-rioters, (7) building a constituency for the program, and (8) redistributing power and resources.

While it may be generally presumed that a program's purposes are embodied in the law, the experience with regard to citizen participation is very different. Except in the case of the Economic Opportunity Act and the Model Cities legislation (and even in these cases) there is little or no legislative language with regard to citizen participation. Even if administrative policies go beyond legislative language and give some attention to citizen participation, one is still left with the finding that policies for participation at the Federal level are misunderstood, piecemeal and erratic in their implementation. One is overwhelmingly impressed with the degree of administrative discretion in this area. And one is even more impressed with the apparent differences in purpose which various administrators attach to the idea of citizen participation. And there are indeed administrators who see no purpose in it at all. As a final note of description with regard to purpose, it was apparent that every Federal official interviewed perceived a lessening of interest in citizen participation on the part of the Nixon administration. This was despite the almost total lack of any hard evidence to support this perception. (The Model Cities Program is the outstanding exception, in that new HUD memoranda issued in May 1969 were viewed as very damaging to certain existing citizen participation arrangements.) If the reader is confused by this perception, he must remember that to Federal officials of any sophistication, the notion of citizen participation is in part a euphemism for the sharing of program authority with the black community. Federal staff apparently do not see such a sharing of authority as a high priority item in the Nixon administration.

In the next section we will examine some definitions of citizen, of participation, of neighborhood and of representation. After that, we will examine Federal practices with regard to participation in three categories of activity: agencies having legislative or administrative policy calling for citizen participation; the Community Action and Model Cities Programs; and agency programs taking cognizance of Community Action or Model City vehicles in order to secure participation. The closing section of the paper will comment on the current state of citizen participation policy as well as recommendations for policy development.

The material for the study was gathered through personal interviews with Federal management personnel in the Office of Economic Opportunity, the Department of Labor, the Department of Housing and Urban Development, and the Department of Health, Education and Welfare. All personnel were based in the San Francisco regional office of their respective agencies and were connected to programs which operated at the city level. These four agencies are not inclusive of agencies interested in citizen participation. The Department of Agriculture has policies on citizen involvement which pre-date most of the agencies being looked at. There are other agencies which are not included, such as the Small Business Administration, the Economic Development Administration, and the Community Relations Service of the Department of Justice, all of which deliver resources of great importance to needy citizens. There are also agencies such as the Bureau of Public Roads whose resources can cause serious disadvantage as well as advantage. Another notable omission is the Selective Service System whose "Little Groups of Neigh-

bors" (see March 1969 issue of Trans-Action) have brought into focus certain ironies and injustices in the use of citizen participants to administer a national policy at the local level.

However, the four agencies selected represent the heart of the Federal system's capacity to deliver resources to those in need at the local level. Furthermore they represent four of the five agencies which have been realigned by the Nixon administration so that their regional boundaries are coterminous. It is precisely with these agencies that a mutually conceived approach to citizen participation may be advisable.

This opening section has suggested that citizen participation is of many parts and definitions. A major focus of this paper will be to capture these definitions as they are part of, and appear to influence, Federal programs. In defining citizen participation as the focus of the study, we were attracted to differences in localities, differing Federal policies and differing perceptions of purpose as ways of explaining variations in citizen participation. The paper will include materials reflecting these differing policies and differing senses of purpose as viewed by regional Federal personnel. This section of the study will be unfortunately salient with regard to patterns of participation as seen locally. Until the local vantage point is incorporated, it is clear that any policy recommendations must be speculations not grounded in the crucial dimension of live locally based experience.

SECTION I

AN ANALYSIS OF KEY CONCEPTS

A. WHO IS A CITIZEN?

This paper defines a "citizen" as one whose current condition makes him the subject for Federal efforts at resource distribution. He is also defined as someone who might be potentially disadvantaged as a result of the use of Federal resources. The purpose of this constructed definition of a citizen is to narrow the field to particular kinds of persons who upon closer inspection turn out to be largely poor, largely minority group, and often largely both. If one accepts the current data that most poor are not minority group, and minority group members are not poor, then it is reasonable to argue that in one sense this definition of "citizen" draws its defining circle around too few people, and yet in another sense we have included inside the circle many who ought not to be there.

The definition problem is not easy. A January 1966 publication of the United States Conference of Mayors showed its biases in favor of a different kind of citizen. In commenting on the requirement of the Economic Opportunity Act for citizen participation, the Conference of Mayors publication noted:

> "It has become clear that the areas to be served in any city contain families of various income levels and it is often the stable citizen in such areas who most often has the time and the motivation to volunteer first for community action. The steady and stable steel worker, postal clerk or fireman who is active in the affairs of the old neighborhood where he lives is a link to his poor neighbors.

They know him and he can often get them involved when a professional staff person or social worker cannot."

OEO programs might accept the "steady and stable steel worker" if he were black or brown as well as steady and stable. Model Cities might have less difficulty with his color if he were "democratically selected" by area residents. The Department of Health, Education and Welfare, in matters pertaining to the organization and delivery of health services, might see him as a "consumer representative;" and also, if he were black or brown, as a representative of the poor.

For the purposes of meeting Federal guidelines there would appear to be less desirable and more desirable citizens. Most desirable would be the combined characteristics of black or brown and poor. If one of these qualities had to be surrendered it would be that of poverty. In return for this, some agencies would then define an acceptable citizen as one of color who appears to have some bona fide connection to those who are both poor and of color. The least desirable person from the point of how well he fits this notion of citizen would be one who is simply poor without being of color. There are,of course, exceptions to this hierarchy of citizens. These might occur where the citizen holds membership in another group which is of devalued status and this group is a focus for Federal program intervention. A "hollow" resident from Appalachia, or a poor older adult from anywhere, would be examples of a devalued citizen. In other instances the values of the administering Federal agency or official, might favor the inclusion of non-minority "citizens" as a priority, to demonstrate that integrated citizen participation bodies are possible.

Given this hierarchy of citizens some further specifications of our definition of a citizen is in order. The ideal citizen seems one who is both disadvantaged and disconnected for (or inadequately to) our major institutions. By being of color and poor he faces double jeopardy in our society. But even if he is of color without being poor, there still seems an assumption that he is disconnected, and therefore a worthy target for citizen participation efforts.

The reader may find these definitions of "citizen" very fluid and unsatisfactory. Partially, it is a result of our refusing to settle for a definition of citizen which is so inclusive as to be meaningless. The citizen who is the target of Federal involvement efforts is <u>not</u> every man. He is a specific segment of the population whose participation can be instrumental in achieving certain purposes. Following the Fox-OSTI analysis (see page 9) the purposes of citizen participation may be described as seeking to: (a) decrease alienation, (b) engage the "sick" individual (rather than the "sick" society), (c) create an organized societal force capable of protecting aggrieved groups and winning for them a fairer share of resources, and (d) develop a constituency and engineer its consent.

In this kind of purposeful world where people are used as instruments, and not because their involvement is intrinsically to be valued, it is no accident that the citizen we emerge with as the target of Federal participation policies is one who is of minority status or poor or, ideally, both. Not surprisingly he is the very citizen who has shown the least propensity for past involvement in the organized life of his community. Whether his lack of prior involvement in communal

life is a symbol of his difficulties or a cause of his difficulties is not at issue here. Rather, it seems proper to suggest that if Federal policy did not define the disadvantaged and disconnected as the specific citizen they were interested in, Federal efforts at citizen involvement would be likely to emerge with the same citizen who has for so long populated the world of voluntary social welfare--the white, the affluent, and the well-born.

We obviously would not want this definition of a "citizen" to be inverted to imply that anybody should be deprived of his citizenship rights because he is not poor, brown, black, or otherwise conceived to be disadvantaged. On the contrary, we assume that those not included in our definition are in a better position to assert their rights and will continue to do so through various political, economic and social channels. We have focussed on a narrow definition of citizen, because it is this citizen who is the current object of so many Federal efforts, and it is this citizen that is implied in the current usage of "citizen participation."

B. PARTICIPATION

A number of interviewees cited difficulties in getting local public officials to agree to provide for citizen participation if the participation was to include those who were poor and/or of color. Others cited the difficulty in making contact with the "right" citizens. But only one interviewee, a black official, suggested that the concept of participation as currently promulgated in most Federal programs, was not worth the game. He suggested that participation by black leadership in local program coalitions might have the effect of blunting or di-

verting the "black revolution."

Any follower of developments in Federally funded programs, since the days of the Juvenile Delinquency Demonstration programs some seven years ago, will not be surprised at this black man's rejection of coalition as a legitimate structure for black participation. In another paper (AIP Journal, July 1969) this writer has argued that Federal programs emphasizing citizen involvement have moved from coalition to adversary forms of participation. These participation patterns may be graphically captured in the following manner:

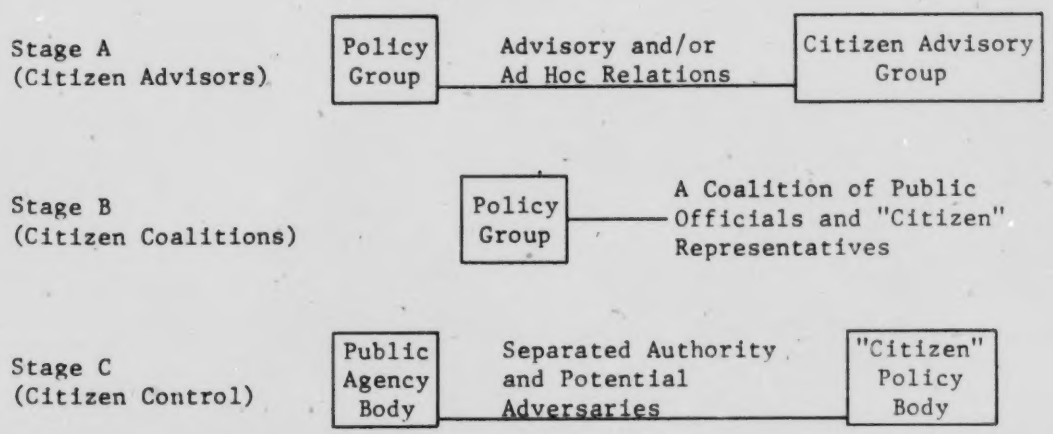


Fig. 2. Citizen Participation Patterns

Coalition policy groups, as represented in Stage B of Figure 2, may be a coalition of individuals representing different points of view or a more formal coalition of different interest groups (e.g. public

agencies, the citizenry affected by a program and general public interests). Such coalitions are distinguished by the fact that control over a program rests with the coalition's policy group. Stage C (citizen control) reflects a situation where a body dominated by citizen representatives has certain final or preliminary authority. In the case of final authority, it would be the citizen dominated body which makes program policy. In the case of final authority, it would be the citizen dominated body which makes program policy. In the case of preliminary authority, a public body would be unable to act on a policy decision until approval had been received from the citizen body. In this instance, the citizen body and the public body become potential adversaries in that each body possesses separate policy authority and neither body can act without the other.

Materials developed by the Federal Executive Board Task Force in Oakland and analytic materials from Spiegel and Mittenthal (see introduction) both suggested a range of intensity to participation. In both analyses the most "intense" forms of participation were of the adversary (control) rather than the coalition variety. Given the currency of separatist ideas in the black community, and the problems confronting coalition forms of participation, one ought not be surprised at the expressed fear amongst black leadership of being "blunted and diverted" by participation in coalition structures. However, this writer was surprised that almost none of the over 40 white officials interviewed expressed similar reservations about coalition forms of participation.

The explanation may be simple. Coalition policy bodies appear to achieve certain key purposes; they appear to reduce the alienation of those involved; they appear to increase the competence and well-being of those involved (to the point where participation in community decision-making has provided an important job ladder for Negro participants) and they appear to ease the problems of winning consent for programs. In effect, participation in councils and policy bodies appears to "cool out" and connect those involved in precisely the way they were supposed to. The literature of citizen participation is filled with references to Pygmalion-like stories of black and brown leadership. In fact, much of this literature winds up with a caveat that participation which creates connection to the "establishment" can at the same time disconnect the participant from the community he is supposed to represent.

There of course are Federal officials who see change as being facilitated by abrasive citizen action, or as one put it, countervailing power. But unless such officials worked in the Community Action or Model Cities Program, they had little opportunity to move participation in their programs to adversary or contention styles of relationship. In some cases, officials could guide their programs to take greater cognizance of citizen-dominated neighborhood councils or model city boards, and in so doing increase the influence of these groups over a variety of Federal programs. But it is the rare Federal official who would guide his program willingly into a situation where citizen-dominated groups (e.g. Community Action or Model City Agencies) could influence the expenditure of resources not in their program domain.

It is likely that in the past few years both Federal officials

and "citizen" leaders have become far more sensitive to the prerogatives involved in different types of participation. Outside of the Community Action and Model Cities programs, most participation is of the advisory-consultative variety. This seems particularly so when the local grantee is a public agency such as a school system, an employment service, a department of welfare, etc. However, there is some evidence that advisory groups composed solely of citizen types (such as an Urban Renewal Project Area Committee, or a Public Housing Tenants Council) can be at least as effective in pressing for change as neighborhood representatives participating in coalition bodies. Thus the intensity of influence does not necessarily move in a linear fashion from advisory relationships, to shared policy functions, to control. In its capacity to hold to a neighborhood (or "citizen") point of view, the all-"citizen" advisory group may be more effective than policy-making coalitions which include a minority of "citizen" interests.

In reviewing interview materials, we are impressed with the great confusion and ambiguity existing amongst Federal officials around the concept of participation. Few personnel seem aware of the range of options covered by the idea of participation. Few agencies have any working definition as to what participation ought to involve. Almost all agencies prefer to leave these definitions to local communities, and are prepared to act as a broker between the local community and citizen groups when faced with complaints. In the area of defining participation, as in every other area connected to the idea of citizen participation, Federal administration by exception prevails. That is, Federal personnel appear to steer clear of the area unless specific exception

is taken by a local group. In such cases of exception, the prevailing Federal pattern of response, is to alert the local agency to the problem and ask that they deal with it.

In the area of participation, as in other kindred areas, the experience, policy, and level of staff concern in the Community Action and Model City programs appear to be of their own category. Only these two programs appear to have given serious thought to the provision of stipends to citizens to facilitate their participation. The Community Action Program has a well developed set of policies concerning stipends for participation, and many local CAA agencies routinely build such costs into their budgets.

The last comment on this issue concerns the difficult question of quality of participation. A number of interviewees report that the actual state of participation is different than its public image. Participation tends to be characterized as superficial, sporadic and often willing to leave policy-making to agency professionals. In this respect, participation amongst minority group and poor people may differ little from what we have known about participation by other segments of our population.

The obvious disappointment with which certain Federal personnel related their observations about participation may indicate the need to establish new expectations about how people participate in communal life. Federal policies ought to be developed with the recognition that participation for all people is a sometimes thing, and that there is a generic tendency to defer to professional expertise. Given these and other cautions, agencies may continue to develop participation policies

which accord with experience, rather than unreal expectations.

C. NEIGHBORHOOD

A Department of Labor Handbook for the Concentrated Employment Program (CEP) reads: "The CEP citizen participation structure must have clear and direct access to the decision-making process of the CEP so that the neighborhood views can influence policy, planning and program decision." (our emphasis)

A Department of Housing and Urban Development circular dealing with "the Social Goals for Public Housing," calls for "greatly expanded participation of tenants in project management affairs, and programs designed to strengthen the self-sufficiency of tenants." "Management should...work with tenants in partnership to create a sense of community in the project, to promote citizenship, and to encourage tenants to put down roots and assume a responsible role in project affairs."

A Department of Health, Education and Welfare Guideline for the development of Comprehensive Health Services Projects asks that "projects should insure that residents of the target area will have decision-making roles in the planning, development and operation of the project, including site and personnel selection." (our emphasis)

An OEO pamphlet on Neighborhood Centers states: "The Neighborhood Center's first task is to engage and involve neighborhood people in its planning, operations, and development. Centers must build on a solid base of neighborhood involvement and resident participation...The board (of a neighborhood center) can also include non-poor residents of the neighborhood who are community leaders and professional people."

In building a case for the centrality of the neighborhood concept in Federal policy, one ought not to avoid the obvious by omitting the legislative phrase "maximun feasible involvement of groups and areas to be served." The insertion of "groups and areas" rather than "of the poor" (which is the common perversion) may have been happenstance, or it may have been conscious recognition that to talk of meaningful involvement, is to talk of collectivities of people. Most often, that collectivity is formed because people share a common grievance, or because they share a common status (such as being a devalued minority group) whose probability of grievance is high. In the case of devalued minorities, the neighborhood becomes the most likely locus of the collectivity.

There is a temptation to suggest that the notion of citizen participation can only be understood in its collective connotation. The argument might run as follows: We began by talking about disconnection and disadvantage as characteristic of the "citizen" that Federal policy has in mind; we then suggested that amongst those who were disconnected and disadvantaged the black poor were ideal targets for involvement. We further suggested that where programs had to choose between black and poor, they would tend to choose black; and lastly we noted that the notion of involvement or participation has taken on a collective connotation. After all the euphemisms and circumlocutions are stripped away we appear to be talking about residential enclaves marked by the density of their black or brown populations. Thus the importance and the visibility of the "neighborhood" or the "target area" as ideas when Federal policy addresses itself to issues of citizen involvement.

Those familiar with the Model Cities and Community Action Programs

will recognize the cogency of the above argument. Even observers of urban renewal, public housing, comprehensive health centers, concentrated employment and a variety of other Department of Labor efforts will recognize that calls for citizen participation have their best fit to areas with high concentration of low-income, black and brown families. But there are other Federal efforts where the minority group neighborhood is but a portion of the program's focus. Such programs include Community Mental Health Centers with their "catchment areas" of 75,000 to 200,000 HUD 701 Planning Grants, and various titles under the Elementary and Secondary Education Act.

In a recent issue of Trans-Action (June 1969), Martin Rein noted the anomaly that national policy will need to simultaneously aim at breaking and building the ghetto. Model Cities efforts, OEO's Neighborhood Centers, and Comprehensive Neighborhood Health Centers essentially aim at building the ghetto, or at least at improving the quality of life inside its walls. In such programs, it seems reasonable to expect that calls for citizen participation will be addressed to collectivities of people inside the minority group neighborhood. Other programs are more concerned with communitywide problems, or with problems which are not disproportionately visited on the poor and the black; these programs might well be acting inappropriately if they were to focus their citizen involvement efforts on neighborhoods of poor black and brown people.

In an earlier part of this paper it was suggested that program "purpose" was an independent variable influencing patterns of citizen participation. In this section on neighborhood it is suggested that

some Federal programs have as their purpose the enhancement of life inside the minority group neighborhood. In such programs it seems likely that Federal policy will come more frequently to define participation as a collective concern of the neighborhood.

Federal programs may arrive at a point of clarity in their policies where it is mandated that local programs deal with neighborhood collectivities when the purpose is neighborhood enhancement. But once having arrived at the neighborhood as the focus for their involvement, there remains the large issue of who to involve in the neighborhood. Some of these issues are currently being faced as Federal agencies decide to deal with or to bypass local Model City agencies. A basic issue for Federal policy in programs aimed at particular neighborhoods is whether to support a quasi-governmental unit able to speak for the neighborhood, or whether to fragment (by design or inadvertently) the leadership of the neighborhood by building separate policy-making/advisory constituencies for each program.

With the advent of the Community Action Program there was an ill-fated attempt in some communities to develop the CAA as the sanctioning device for all Federal inputs affecting poor people. In most cases CAAs were simply not aggressive enough in developing their potential sovereignty; in other cases Federal agencies (ironically at times including other parts of the OEO) refused to recognize the CAA as an appropriate local sanctioning agent for Federal efforts.

Under a somewhat different charge (concern for a neighborhood, rather than for all poor people) the Model City agency has set out with the hope of being sovereign over Federal resources coming into the

local neighborhood. The result is not clear, but current experience suggests that most Federal agencies will continue to foster the establishment of separate neighborhood policy groups, and to bypass the Model City agency when it suits their funding needs.

In the Spring of 1968 this writer was party to an interesting attempt by the West Oakland Planning Committee (the Oakland Model Cities Citizens Structure) to bring together six Federal agencies to ask whether these agencies would recognize a veto over Federal inputs into the West Oakland Model City area. The six agencies (OEO, HUD, DOL, HEW, EDA and CRS of the Department of Justice) all hedged their responses in such a way as to indicate they would reserve to themselves, or to their local clients, the decision as to whether to be guided by a veto of the West Oakland Model City group.

There may well be negative consequences to allowing a single neighborhood group to determine the extent and kind of Federal activity in a neighborhood. The most negative of consequences (assuming that integration remains a national goal) would be a growing stake by such a neighborhood group in the continued separation of the area as a planning and living entity. One can speculate that the growth and strengthening of a single powerful neighborhood governing mechanism will create the same kind of stake in fragmentation which plagues so many other areas of our public life. On the other hand, dealing with a single neighborhood mechanism by all Federal agencies would be an important step toward the creation of neighborhood units which would be key links in any effort at decentralization of government beyond the city level.

If one purpose of citizen participation is the redistribution of

power and the creation of units which can help to secure more equal protection, then Federal policy supportive of a single powerful neighborhood group would seem appropriate. But as suggested earlier, power redistribution and the facilitating of equal protection for disadvantaged groups, may not currently be an important purpose of Federal citizen participation policies. Nor is it a purpose without risk in that the building of a single neighborhood governing structure may further increase and harden racial separatism.

D. REPRESENTATION

In a letter responding to Reverend Abernathy during the 1968 Poor People's Campaign, HEW's Secretary Wilbur Cohen pointed out that HEW intended to establish "an advisory committee composed of recipients and other needy persons to consult with the Social and Rehabilitation Service." In his following sentence, Secretary Cohen captured the dilemma which confronts every Federal agency dealing the the problems of representation. Secretary Cohen wrote: "We have already identified several persons among members of the Poor People's Campaign whom we intend to invite to serve on such a committee. We will seek the help of the Southern Christian Leadership Conference, the National Welfare Rights Organization, and other appropriate organizations..." On the one hand Secretary Cohen appeared to want control by having his agency identify potential representatives. But in addition, he wanted the advisory committee to have legitimacy in the poor/black community, and thus indicated his willingness to seek representatives who had a constituency.

At the local level, Secretary Cohen's dilemma is generally resolved through the grantee agency selecting those it feels are representative. Thus one Office of Education respondent reported that in building a local citizens committee, a school principal is generally asked to identify parents who can effectively participate. In the same way, nominees for advisory committees on Title I ESEA programs may be selected by school parent groups.

The Regional Office of the Department of Housing and Urban Development reported some 25 Project Area Committees (citizen advisory groups) as part of urban renewal programs. But it is also reported that such advisory committees were always selected by the local redevelopment agency, sometimes based upon the advice of neighborhood organizations. The prevailing model of picking representative citizen participants seems patterned after the process by which many appointive city commissions are chosen. The chief executive makes his choice guided by a complex of factors: the desire to get "good" people, the desire to pay organizational debts, and the desire to connect constituency groups to his administration.

Respondents in HUD, in particular, reported periodic complaints with regard to the issue of representativeness. Local groups apparently seek to involve HUD as an arbiter in protesting the make-up of citizen advisory groups. All HUD respondents were of a single voice in saying that they were careful not to intervene when questions were raised about the character of local representation. One noted that "D.C. has warned the Region to never get into the issue of which is the representative local group." HUD invariably views the legitimacy of representation as a matter for local concern. This policy even seemed to prevail in the

Model Cities Program with its far greater emphasis on citizen involvement, and its policy guideline that "the leadership (of the citizen participation structure) must consist of persons whom neighborhood residents accept as representing their interests."

An interesting example of the way in which Federal staff becomes "double agents" in this matter of representation was the staff member who told a complaining local NAACP chapter that choice of representatives was to be determined within the city. However, since the complaint, this same official has made a practice of alerting the NAACP to the impending formation of citizen groups so they could put pressure on the mayor for representation.

As in other aspects of citizen participation, the OEO experience seems to reflect the most careful and penetrating thought about the problems of who is "representative." The Community Action Program Guide states the following:

> "In the selection process, there should be maximum possible involvement of the groups and persons to be represented. The selection process should be designed to encourage the use, whenever feasible, of traditional democratic approaches and techniques, such as group forums and discussions, nominations and balloting. This will minimize the possibility that a representative does not command the support or confidence of the group or area that he represents."

Relatively large communities with sizeable black populations were the most likely, in OEO's early experience, to hold elections. In most cases the voter turnouts were disappointingly small, and OEO began to discourage the use of Federal funds to support local elections of representatives to Community Action Agency boards. On its face, the validity of an election as a means of securing "true" representation

could not be countered. Model City agencies in the West almost always turned to elections as the most acceptable device for securing representation. Interestingly, the percentage of turnouts in Model Cities elections were markedly better than those in elections held by Community Action Agencies. And the Community Action Program staff report that big city CAAs currently tend to get their citizen representatives through an election process, while smaller cities and rural areas resort to selection of representatives by public bodies rather than through election.

In its early concerns with the issue of "representativeness" the CAP seemed to be moving toward securing a constituency for a representative. This idea of a constituency dovetailed with the relatively large expenditures that Community Action Agencies were making on neighborhood organization activities. The thought was that organized neighborhood groups (such as councils, tenant groups, local action groups, etc.) would select their own representatives to sit on Community Action boards. These neighborhood groups would in turn act as a constituency for the representative; they would hold him responsible for representing neighborhood desires to the larger community. OEO respondents report that there is still interest in building constituencies for a representative but that, generally, OEO appears to show much less concern with the whole issue of representation. Covertly, there seems a feeling amongst OEO staff that in large cities, the organized black community will be able to take care of itself with regard to insuring that it is represented on CAA boards.

The expressed feeling of a HUD respondent that the Nixon

administration wanted programs to deal with "responsible Negroes," contrasts sharply with a February 1968 OEO memorandum on Title ID, Special Impact Programs. This memorandum notes that, in selecting grantees:

> "No significant group of neighborhood people should be left out. Failure to involve the moderate and more conservative elements of the ghetto community will seriously handicap the organization's ability to gain the confidence of the community at large and to take advantage of outside talents and business skills. Failure to include the militant elements of the community will leave the project vulnerable to disruption by these elements. Thus, unless the group is broadly representative, it will fall prey to splits and schisms within the community and may fail as a result."

In a journal article (Social Work, forthcoming), this writer concluded that any attempt by white leadership to determine who represents the black community automatically makes that representation suspect. That conclusion seemed to fit the emerging Model Cities Program. In feeling, it undoubtedly still represents organized black reaction to attempts by whites to select black representatives. But the greater part of current experience in Federal programs still reflects patterns of selection of representatives by established agencies rather than election by neighborhood citizens and groups.

A final pertinent commentary on this issue of representation stems from the experience of one black Federal official in dealing with almost all-white communities. He reports that when he raises the issues of participation and representation, the response borders on the incredulous, as if to ask, "Who do you think the elected officials in this community represent?" It recalls the private remark of a former key official of HUD that "an election is a form of citizen participation." Of course, it is. Our political system is embedded in concern for

popular rule. But to imply that new approaches to participation and representation are unnecessary is to ignore the futility and anger that many feel in their inability to have their voices heard in community decisions which affect them.

SECTION II

POLICY DESCRIPTION AND ANALYSIS

In this section we will look in some detail at citizen participation in specific government programs. If one grants the uniqueness of citizen involvement in the Community Action and Model Cities Programs it is useful to consider the policies and practices of Federal programs in three different categories:

(1) programs having legislative or administrative policy calling for citizen participation,

(2) the Community Action and Model Cities Programs and,

(3) Federal policies affecting program delivery to communities having Community Action or Model Cities Programs.

A. PROGRAMS HAVING LEGISLATIVE OR ADMINISTRATIVE POLICY CALLING FOR CITIZEN PARTICIPATION.

1. Department of Health, Education and Welfare

a. Health Services Projects. The various administrative guidelines for Public Health Service programs use the language of citizen participation, even though the basic law does not. Guidelines for grants under Section 314(e) of the Public Health Service Act indicate that "desirable characteristics of comprehensive health service projects (include)... use of residents of the target population in policy making, planning and working roles." Under a separate section of this guideline headed "community participation" applicants are told that they "should ...make provision for the active participation and advice of residents and practitioners from the project area in defining changing needs, special problems and major gaps in services." A HEW staff member pointed out that

while the guideline made no reference to percentages on participation, they would consider a policy group having one-third of its membership from the target area as "too small." The guideline is also very specific with regard to training and career development for residents from the "service area." The applicant project is told that it "should...establish program linkages with high priority national programs, such as Model Cities and Neighborhood Service Programs."

Applicants under Section 314(b) of the Public Health Service Act for Areawide Health Planning Grants are told that eligible applicants must have boards of directors or advisory councils with a majority of their membership drawn from "consumers of health services broadly reflecting geographic, socio-economic and ethnic groups in the area." (In the new language connoting America's group differences, apparently Negroes have become an ethnic rather than a racial category.)

Section 314(a) guidelines for Comprehensive Health Planning Grants to States also includes a variety of language alluding to citizen participation. The State grantee is told that it must establish a State Health Planning Council whose membership should "reflect the geographic and socio-economic distribution of the State's population and should include representatives of minority groups." States are also told that "consumer representatives must constitute a majority of the Council membership."

In a 1967 statement on the Partnership for Health Program, the Surgeon General cited "involvement of the indigenous population, both in the planning and the implementation of projects" as a priority item.

Not surprisingly, the guidelines for Rat Control Projects under P.L. 89-749 asks grantees to "develop procedures for involvement of

residents and property owners in planning and program activities to help bring about citizen understanding, participation, and support."

It is apparent that the language of citizen participation has found a prominent place in administrative guidelines issued under various health service programs. The language is not prescriptive in terms of what "good" citizen participation is supposed to look like, and the language is careful to distinguish citizen involvement as desirable rather than mandatory. As underlined in a previous paragraph "should" rather than "must" is the term used. (As one who has on many occasions labored over the wording of Federal memoranda, I am aware of the importance attached to a "must" over a "should" or a "could".)

It is interesting to note HEW's introduction of the concept of "consumers," interchangeable with or perhaps in place of "target area residents" or "citizens." In these Health Services programs, HEW administrative policy has provided a large foot in the door to be used by officials who care about the issue of citizen participation.

Respondents of the Regional Office felt that the Department's Division of Health Care Services is very supportive of citizen involvement efforts in the Health Care Program. They cited grants in Oakland and in New York City, both of which went to community corporations, as evidence of the department's willingness to become deeply involved with citizen participation. In Oakland the grantee is a citizens' consumer corporation whose policy board is comprised of twelve black residents of the West Oakland neighborhood.

Despite the use of community corporations for two of their most visible grants, Health Services staff admit to having no explicit model

of what good citizen participation is. As one respondent characterized it, "We know when we want more, but we are not sure of what more is."

HEW health services personnel seem particularly pleased at their success in insisting that "consumer" representatives have the right to influence the hiring of professional personnel. The assumption seems to be that if Federal policies can win entre for neighborhood people in the hiring of physicians, there is little else that would be outside their purview.

The Federal personnel spoken with were keenly aware of the policy implications of medical services decentralized on a neighborhood basis. While they would prefer to see health centers compatible with "ethnic backgrounds," they still do not know how to deal with the segregationist implications of neighborhood based care. In the Western Region, Federal personnel cite Seattle and Oakland as polar positions with regard to the issue of neighborhood location. In Seattle, the Health Services Task Force of the Model City Agency has made a specific recommendation in favor of "mainstream" medicine; that is, the enhancement of central facilties and their accessibility to neighborhood people, as opposed to the Oakland demonstration of a virtually all-black clientele for a neighborhood based health center.

The Federal health services personnel indicated their interest in securing approval for the payment of stipends to neighborhood people for participation on health center boards. Apart from OEO and Model Cities staff, these HEW health personnel were the only officials interviewed who appeared concerned with the use of money to facilitate neighborhood participation.

b. Community Mental Health Centers. The various public laws providing for construction and developmental grants for community mental health centers make no mention of citizen participation. The literature of the program appears strangely silent. The one discernible mention is almost a parody of what citizen participation was like in another era. A brochure on Mental Health Centers, subtitled "incentive to community action" says, "Planning for a mental health center should be on as broad a base as possible, involving all the major community leaders and organizations... The mental health association as the citizens group representing the public should also be involved in the planning. Associations can, in addition, bring into this important planning process other voluntary groups." Parenthetically, it should be noted that this brochure was issued in 1964. There is much evidence, in all Federal departments, that Federal language with regard to citizen participation has changed radically in the past five years.

The National Institute of Mental Health personnel interviewed made clear that despite the paucity of injunctions to citizen participation in their guidelines, there is in fact a strong commitment in this direction by NIMH. A May 1969 NIMH employee newsletter boasted that "the present high level of citizen involvement in mental health is unprecedented in any public health field." The problem for the observer of Federal programs is to make some determination of what is meant by "citizen" and by "involvement" are only dimly perceived. If the personnel involved were not so concerned and essentially decent, the citizen participation game as played between many Federal agencies and local grantees, would appear as if in a Kafka novel. The dialogue might run as follows:

Federal Person:	We want citizen participation.
Local:	What is it you really want?
Federal:	Show us your plan. (Local shows plan.)
Local:	What else do you want?
Federal:	We can't tell you. It's your plan, but this is not good enough.

In the Community Mental Health Center Program, staff feel that they are in no position to turn down a grant because the grantee is weak in the area of participation. But in their pre-review meetings with a potential grantee NIMH staff let the grantee know that applications showing citizen participation will be more favorably reviewed. Federal staff transmit their interest in having the Center involved with neighborhood associations and other grass-roots groups. They appear to want the Center connected to "key people--those respected in the neighborhood."

The Mental Health Centers' program appears to have no definition of who is a "representative" or how one gets him on a Center board. In essence they leave it to the local agency to define a citizen participation system, while presumably making it clear that they expect some such system in each Center.

The net result of this kind of fluidity in policy seems to insure a variety of citizen participation patterns. It also seems to give the Federal field person more items to bargain with, and more opportunity to impress his personal values on a client agency. Interviewees indicate that the opportunities in this kind of citizen participation system have been aggressively used by NIMH staff to further participation.

It should be clear that there are risks and opportunities in this kind of vague policy definition in the area of citizen participation. The risks are that, through conspiracy or lack of interest, very little will happen. The opportunities are that concerned staff and receptive grantees may evolve patterns which are far more innovative than those which would evolve under relatively rigid and uniformly interpreted guidelines.

c. Office of Education. A Senate working paper on Title III of the Elementary and Secondary Education Act notes that the title "invites schools to step into a relatively unexplored area of community participation: namely that of joint planning of school innovations." However, the working papers go on to point out that the language of the Act does not emphasize the community as such, or spell out what might be meant by public participation. Parenthetically, to the writer of this Title III working paper (not a Federal employee) community involvement appeared to mean PTAs, "Dad's clubs," and "open houses" amongst others. Formal documents pertaining to programs administered by the Office of Education do not appear to take much greater risks with their requirements or recommendations for citizen involvement. Title I of the amended Vocational Education Act (P.L. 90-576) requires the establishment of a State advisory council. Amongst nine detailed categories of membership on this Council, one calls for "a person or persons... representative of the general public, including a person or persons representative of and knowledgeable about the poor and disadvantaged."

The Adult Education Act of 1966 calls for the establishment of State and local advisory committees, but makes no specification as to what kind of persons ought to be represented on these committees. Similarly,

the regulations of the Office of Education applicable to training programs under the MDTA Act of 1962, as amended, calls for the establishment of a state advisory committee but only encourages the use of local advisory committees (a significant difference in language). The regulations further require that such advisory groups shall include "insofar as practicable" representatives of the disadvantaged.

The guidelines to Title I of the Elementary and Secondary Education Act call for advisory committees on both the State and local level to include half their memberships from representatives of the poor. Despite these guidelines, Federal staff report that actual local patterns of participation vary greatly. There is very little monitoring capacity in the Office of Education and its basic relationships are to the State Offices of Education rather than to local school districts. Thus the concern and interest of State leadership in the use of advisory councils becomes a key predictor of the character of local participation. Even where Federal staff receive complaints about local programs, these complaints are funneled to the State Office of Education, rather than being dealt with directly through the local school district.

In a number of communities there is a history of abrasion between school systems and Community Action Agencies over the approval of Title I ESEA Programs. One respondent reports that Model City and Community Action Agencies are merely used as "reference points" by school systems. These same school systems develop their own "house" advisory groups rather than making use of existing citizen participation mechanisms already supported by other Federal programs. The net result under Title I ESEA Programs, an effort intimately involved with distributing sizeable Federal

resources to children from low-income families, is that there is little Federal capacity to influence the character of local citizen participation in those programs. Because the Federal office seems effectively blocked out of local involvement, there appears to be minimal energy expended on defining issues of participation, representation, neighborhood, etc. In the absence of Federal legislative mandates, coupled with the comparatively high money stakes in the Title I Program, the issue of citizen participation seems to have become a creature of State rather than Federal policy.

As previously noted, the regulations for MDTA training programs "encourage" the formation of advisory committees. The actual experience is that such MDTA committees tend to be non-existent, while the state committees are weak.

Perhaps one ought not be surprised at the state of citizen participation in the area of education. Two factors operating in tandem would seem to be overwhelming. First is that the Office of Education, because of past history, the character of its legislation and the slimness of its staff, seems to be effectively insulated from direct relationships with localities. Second, the schools, perhaps more than any other public organization, have had a history of developing and absorbing a citizen constituency.

One needs to weigh the observation about the school's capacity to build "house" groups of parents against the following response by Secretary Cohen to the Poor Peoples' Campaign. The Secretary wrote that new guidelines were being sent to Chief State School Officers which "require the involvement of parents of the disadvantaged in determining priority needs for Title I Projects." In addition, Secretary Cohen wrote that:

> "regulations implementing new amendments to Title III... provide specifically for representatives of the poor on State Advisory Councils... Projects affecting poor children will be required to assure participation of the poor in assessment, planning, and development, and evaluation at the state and local level."

These are vigorous words with regard to Federal policy on citizen involvement. But to this point in the Western States their impact varies by state and is generally minimal. Perhaps, when Federal policy meant to affect local practice has to be strained through a state mechanism, it would be wiser to spell out what is meant by participation, and by "involvement...in determining priority needs," and by "disadvantaged" and "representation," and all these other clarifying points which are generally handled inside of a relationship when there is direct contact between the Federal office and the local grantee. And perhaps most important of all, there ought to be some hint as to what the sanctions might be when the state does not act to implement national policy. But of course, that is a failing in all programs, not just those in the Office of Education. They simply seem more pertinent in the Federal-state relationship because sanctions are so difficult for Federal administrators to invoke on this level, as opposed to the local level.

d. HEW - Miscellaneous Programs. The 1968 HEW Task Force on Organization of Social Services raised anew an issue of citizen involvement which had earlier been addressed by HEW's Office of Juvenile Delinquency. The issue was "to what degree can public money directly or indirectly support protests which are directed toward services and protests which are directed toward institutional change?" The very question offers a public policy alternative which has nowhere found its way into this paper on Federal policies toward citizen participation. Up to this

point our discussion of participation has been based on an assumption that citizen action implies, to whatever degree, a share in decision making from the inside rather than pressure through contention from the outside. But in 1964, Mobilization for Youth in New York City provided a severe test for HEW, in that HEW funds (through the Office of Juvenile Delinquency and NIMH) were supporting a style of citizen participation which included modes of protest and contention. The issue of public financial support of contention styles of participation has been kept alive in the Community Action Program and may yet become of significance in the Model Cities effort. The support of protest activity is not now a policy issue in HEW supported efforts, although it could be if, for instance, there were a repetition of efforts to use public welfare department funds to support welfare rights organizations. (It was this issue which contributed to the dismissal of a California State Director of Public Welfare under Governor Brown.) There also is evidence that the policy issues around public support of protest will not become large in the Nixon administration. However, the problem which creates the policy issue will undoubtedly remain with us. Some public agencies will simply not move except in the face of conflict tactics. Citizen participation in shared decision making or advising does not appear to be adequate to supply the necessary abrasion for movement. Then whose task does it become to support citizen organization for protest? Perhaps the policy issue may become academic if the growing strength of minority communities having independent sources of financial support forecasts a genuine trend.

In 1965, a technical advisory panel for HEW's Office of Juvenile Delinquency dealt with the issue of support for protest activities by stating

that the purpose of neighborhood organization efforts "must be the incorporation of the disadvantaged into the mainstream of American life and opportunity... Projects which ignore existing institutions and established channels, projects which operate outside the scope of the law, projects which aim only to protest injustice, are not eligible for governmental support. Within this general understanding, a variety of approaches have been and may continue to be tolerated and encouraged." When this language is dissected, it emerges as still seeking to support protest activities, so long as they are couched amidst other forms of activity. To that extent, this 1965 HEW statement has no match in other Federal policy statements, except in OEO's CAP guidebook.

e. Conclusion. One might have predicted that HEW, more than any other Federal agency, would be in ferment over the issues of citizen participation. In Secretary Cohen's June 1968 letter to Reverend Abernathy, it was noted that President Johnson had described HEW as the "Department of the People." Surely, the resources HEW administers under the rubric of "welfare" are the most visible and significant, however inadequate, to poor, black and brown people. Certainly no program brings out the issues of citizen participation more sharply than does public education. To talk education in 1969 is to talk of decentralization, neighborhood control and many other social issues which touch the raw nerves of America today. Then too the area of health is a big part of that syndrome of problems which plagues America's poor. And it was HEW which fathered the Office of Juvenile Delinquency's comprehensive demonstration programs, which very early incorporated all of those programs (legal services, pre-school, neighborhood organization, multi-service centers, and many aspects of citizen

involvement in decision making) which have come to characterize the potentials of citizen participation.

Yet in terms of its policies and its practices, HEW does not seem an agency deeply enmeshed in the issues of citizen participation. (There are important exceptions of course, and the foregoing pages have cited some of them.) The most important explanatory factor may be HEW's basic relationship to states rather than to localities where the issues of citizen participation are fought out. The fact is that under the pressure of a Poor Peoples' Campaign, haunted by the memory of Martin Luther King, HEW could come forth with words which are bold in spirit and commitment to the idea of citizen participation.

> "We will require States to include representatives of the poor on State Medical Assistance Advisory Committees. Consumer representation should be required on all councils which deal with matters pertaining to the organization and delivery of health services... such consumer representation should include representatives of the poor. Administrators of other programs affecting the disadvantaged have been directed to develop guidelines and regulations, within the limits of legislation, to assure maximum participation by representatives of the poor in all stages of program development at the local and state level. The Office of Education will intensify its efforts to establish and extend its contact with organizations... working with poor people so that the Office's educational programs will reflect the needs and wishes of those to be served. We agree that there is need for more specificity on numbers of the poor to participate in programs at the State and local levels. We have already issued policy regarding services in AFDC and Child Welfare requiring every state to establish an advisory committee with recipients or their representatives constituting a specified proportion of the membership. We intend to issue similar requirements for other SRS programs."

There is no mistaking the commitment in these statements. And it may be that HEW's experience since Secretary Cohen's June 1968 statement is qualitatively different. It is hard to ascertain this based upon a series of interviews in the field at a single point in time. And it may in

fact be that the basic character of HEW's relationship to the State seriously tempers HEW's capacity to realize its policy commitments. As David Austin has pointed out in his assessment of local Community Action Agencies, the character of the local vehicle is an important deflector of Federal policy aims. The power of the states may have overwhelmed HEW's possibilities for broad achievement of presumed goals with regard to citizen participation.

2. Department of Labor

In the spring of 1968 a meeting (mentioned earlier) was held in Oakland involving the representatives of six Federal agencies, the City of Oakland, and the West Oakland Planning Committee (a neighborhood group representing the primarily black area of West Oakland). At this meeting Federal representatives were asked whether their programs would either mandate or honor the exercise of a program veto by the West Oakland Planning Committee. As I recall, the Department of Labor representative had the easiest time of all Federal staff in fielding this question. He simply said that the bulk of DOL programs were funded through the Oakland Community Action Agency, and DOL assumed that this agency was sensitive to the desires of the neighborhood.

A closer inspection of DOL programs to ascertain citizen participation policies reveals that on a formal level, the Community Action Agency is a conduit (a sponsor) of many of the Department of Labor's local efforts. A Department of Labor sponsor's handbook refers to four programs authorized by the Economic Opportunity Act of 1964, as amended. These are the Neighborhood Youth Corps, the Special Impact Program, Operation Mainstream and the New Careers Program. The notebook notes that all four of these programs "will be developed by or with Community Action Agencies and that the CAAs

will be the sponsor (i.e., be the prime grantee or prime contractor)." With specific reference to the Special Impact Program, the handbook notes that "priority will be given to projects which:... provide for maximum participation of neighborhood residents in the implementation of the project, including the hiring of such residents for jobs created by the project." In this same handbook the DOL further ties itself to OEO policy by requiring that CAA sponsors "must conform to CAP Memorandum #57, in assuring that representatives of the poor participate in the planning and development activities connected with Title II projects."

In a February 1969 handbook referring to the Concentrated Employment Program (CEP) and the overall Comprehensive Work and Training Program (CWTP) it is noted that the prime sponsor for both efforts will generally be the Community Action Agency. In some cases, the handbook suggests a Model Cities Agency may be the CEP sponsor.

The language of the CEP handbook is firm with regard to its citizen participation commitments. It cites Title IB of the EOA legislation which calls "for participation of residents in the area and members of the group served in the planning, conduct, and evaluation of the Comprehensive Work and Training Program and its components." In expanding upon this charge to citizen participation the language of the CEP handbook is an interesting amalgam of OEO and Model Cities language. The guidebook reads:

> "Citizen participation can take any number of forms, ranging the spectrum from reliance upon a Community Action Agency board's executive powers, to neighborhood residents taking an advisory role on CEP development and operations, to organizing policy-making committees and monitorships. The relationship of that structure must consist of persons whom target area residents accept as representing their interests."

In other clarifying material on the CWTP, there is specific definition of how the requirements for an acceptable citizen participation structure could be met.

> "Agencies governed or administered by a board of which at least one-third of the members are democratically selected from the groups to be served shall meet this requirement. In all cases where a prime sponsor is not so structured, it should establish a special board which includes, as at least one-third of the membership, democratically selected representatives of the area to be served. This special board should be given responsibility for overseeing the planning, conduct and evaluation of the CWTP and its components."

Unlike any of the policy material reviewed in HEW programs, the DOL material unequivocally calls for "democratically selected representatives." However, one might suggest that the notion of "responsibility for overseeing" could be subject to a variety of interpretations as to what kinds of power are intended for the prime sponsor's board. Despite the ambiguity of this language, it seems to offer much different possibilities for participation than language calling for "advisory" groups, or "participation" or "involvement."

The amplifying materials gathered in the field interviews were extremely interesting. This in part was due to the anomalous situation that DOL finds itself in on the issue of citizen participation. If President Johnson could call HEW the department of the people, he could hardly do the same for DOL. One almost senses that DOL has stumbled into the issue of citizen participation and is not quite sure what to do with it. As one respondent put it, "by dealing through the Community Action Agency, DOL assumes that it gets communal involvement." Another respondent charged the nuance of this comment to suggest that "the Department of Labor is saved from dealing with citizen participation because it deals with the

CAA." Despite those comments, it is clear that in tying many of its programs to CAA, the DOL appears to have consciously bought a full measure of citizen involvement in its local efforts.

This dependence on the Community Action Agency, if it continues, would appear to portend major additional involvements with issues of citizen participation for the DOL. With the relative stagnation in OEO funds, and the increase in funds for manpower programs, a number of Community Action Agencies have reached the point where they receive more of their program resources from DOL than they do from OEO. This will undoubtedly lead to greater responsibility in DOL for the monitoring of citizen participation issues. An interesting problem which one respondent has noted is the increase in complaints from Spanish-speaking and other white individuals about the use of certain CAAs as prime sponsors for DOL programs. The complaint rests in the perception that the Community Action Agency's policy making is controlled by the black community to the detriment of non-black individuals interested in manpower programs.

The DOL uses a new concept which is somewhat similar to HEW's reference to "consumer" participation. A DOL Manpower Administrator's Order devotes a section to "enrollee participation." This Order notes "it is the responsibility of the prime sponsor and each delegate agency to establish regular procedures for the meaningful participation of project enrollees in the conduct and ongoing evaluation of CWTP programs. However, one DOL official noted that they are really unsure of what "enrollee participation" means and they expect Community Action Agencies as prime sponsors of program to deal with the issue.

One respondent cited an instance where DOL's increasing contacts with Community Action Programs have aided DOL in telling other program sponsors what is meant by citizen involvement. In the cited instance, the DOL field representative suggested to a school sponsor of a Neighborhood Youth Corps program that they become acquainted with involvement efforts in OEO-sponsored summer youth programs.

Another example of emerging citizen involvement policy may be peculiar to DOL in the West. It concerns citizen representation on the Cooperative Area Manpower Planning System (CAMPS). A proposal for an experimental project has requested funds for the California State Employment Service to hire neighborhood representatives who would act as liaison to the CAMPS committee. However, top level regional staff see this proposal as a wedge for making a more significant policy change affecting the structure of participation in CAMPS. These DOL officials would prefer to see CAMPS committees enlarged to include neighborhood representatives without having them come on the committee through the "back-door" of the State Employment Service. Of course, at this point the always thorny issues of who represents who, and where do they come from, have not been dealt with.

In recent years, a number of DOL's manpower training efforts have mandated that they serve a minimum percentage of "disadvantaged" people. Thus when writing an On-the-Job-Training (OJT) contract with industry, DOL recommends that employers establish contact with "grass roots" groups who would feed the right kinds of trainees to the OJT contractor. In other cases, in the past, DOL has used neighborhood groups as prime contractors to insure that the region would meet its quota of 65 percent involvement of "disadvantaged" in training programs.

DOL has also recommended the formation of MDTA advisory committees, but without any stipulation that these committees include neighborhood people. The experience, as with HEW's Training Committees under MDTA, is that where committees exist, they rarely include neighborhood representation.

Department of Labor - Summary. The nature of DOL's funding relationships is beginning to bring it into direct, continuing and increasing contact with all of the issues of citizen participation. Despite DOL's relatively recent entry into the program field, one senses that increasingly DOL will have to recognize that one of their primary program constituencies is composed of poor people who look to DOL's resources for assistance in training, in placement, in job development, and in the administration of programs in which the government essentially acts as the "employer of last resort."

As the implications of DOL's heavy involvement with the Community Action Agency are better understood, and as the leadership of minority communities come to better recognize the potentially potent role of DOL in their lives, one can predict that DOL will have to reexamine its reliance on the Community Action Program for its citizen participation policies. Amongst DOL staff one no longer hears reference to the employer as if he were the sole client of the agency. But one does not yet sense a full understanding of the need to better match DOL policies, and its field capacities, to the agency's changed role on behalf of the unemployed and the underemployed.

3. Department of Housing and Urban Development

a. Public Housing. It is likely that Federal policy and Federal experience with regard to the organization of tenant groups and

public housing, offers a sensitive barometer of the issues in citizen participation. Public housing has over thirty years of experience with low-income populations, gathered together in single locations so as to constitute neighborhoods. And in large part these have become neighborhoods reflecting minority group concentrations during the past twenty years. There is little question that there has been ferment over policy with regard to tenant organization, and tenant involvement in major aspects of public housing.

A 1961 housing authority handbook issued by the Public Housing Administration captures the above changes over time in the following words:

> "During the early years of the low rent program many local authorities encouraged organization of the tenants into community organizations or associations and where thereby assisted to a considerable degree in providing social and recreational activities for project residents. This was possible because of a relatively stable population containing many people with leadership ability. Later, it became increasingly difficult to keep the group stimulated and their efforts directed toward constructive programs. Consequently, many tenant organizations became inactive.
>
> In the last few years there has been a movement toward again recognizing the value of tenant organizations. Many tenant organizations after having received the proper orientation by management are now rendering valuable assistance to both residents and local authorities."

A subsequent Public Housing management handbook suggested that:

> "Residents, of course, should be permitted to form their own organization, elect their own officers, and be free to carry on a program of activities."

This kind of administrative language would strongly suggest that there were those on the Federal and public housing levels who were not overly enamored of tenant organizations. Field interviews corroborated this by suggesting that public housing officials had come to see tenant groups as

Communist dominated, and that the encouragement of these groups was largely abandoned during the height of Senator McCarthy's influence in the early 50's.

By 1968 a favorable policy position with regard to tenant activities was more firmly defined. A circular issued by HUD stated that:

> "As a matter of national policy, the following are among the most important social objectives of the program:... greatly expanded participation of tenants in project management affairs and programs designed to strengthen the self-sufficiency of tenants."

This circular also called for:

> "The adoption of procedures whereby tenants, either individually or in a group, may be given a hearing on questions relating to Authority policies and practices, either in general, or in relation to an individual or family."

Local housing management was also asked to "assume the responsibility for encouraging and assisting tenants to get together to solve problems... to develop two way communications with tenants concerning basic policy,... give residents the opportunity to participate in the determination of management policies and practices, ... involve tenants in plans for physical improvement... involve tenants in the selection and implementation of programs and activities intended for their own benefit...."

This marked change in public housing policy appears to be of great importance in suggesting direction for policy change in other Federal programs. Public Housing estates in many instances represent a significant congregation of human beings, and (except for housing for the elderly) these human beings are often of minority group status. In effect, public housing often becomes neighborhoods of black and brown people governed

by an "alien" force. Housing authorities lack the legitimacy of elected public officials. Rather than seek to incorporate tenants within the policy level of the Housing Authority, Federal policy appears to encourage the formation of tenant groups which can play a potential adversary role with the management. And this is not just a passive encouragement. The aforementioned HUD circular asks management to "afford the tenants full opportunity to organize, including the provision of meeting rooms and access to tenants lists and bulletin boards."

Apparently public housing presents a much cleaner arena for the development of policy, once there is a national will to seek change. Of course the crucial issues of what actual authority, tenants groups can possess in the making of decisions is left undefined. But on a comparative basis, the position of public housing seems to have more substance and direction than HEW's definition of a "consumer" role, and DOL's "enrollee." Obviously, living in public housing impinges more broadly on the life space of an individual than would a neighborhood health center or a job training program. Precisely because the impact of public housing is greater, this movement to foster an independent tenant force seems to have important policy implications for other Federal programs.

Experience in the formation of tenant groups suggests that the smallest housing authorities tend to be uninterested. It would be useful to discover whether these smaller authorities tended to have fewer minority group residents.

In the West as well as in other parts of the country, public housing has been in the midst of riot areas. In Los Angeles it is reported that the existence of tenant groups aided in cooling violence. Conversely,

in San Francisco violence has occurred in the very housing where there are tenant groups.

Despite the new emphasis on tenant involvement, two things seem essential to point out in terms of policy development: no tenant group in the West has any real authority for the management of a project and no local Housing Authority includes tenants. In California, the issue of tenant inclusion on the board of an LHA is very alive. In Los Angeles where Federal staff temporarily managed a much plagued authority, two tenants were requested to sit on the authority board but were turned down by the city attorney. Additionally, California State Senator Nicholas Petris has introduced a bill to make tenant inclusion on LHA boards mandatory. Lastly it should be noted that there is no written HUD policy encouraging tenant inclusion on LHA boards.

b. Neighborhood Facilities Program. In its administrative guidelines for citizen involvement, the Neighborhoods Facilities Program uses a device which is repeated in certain HEW programs. The guidelines do not mandate or even recommend particular patterns of citizen involvement. They do suggest that applicants who meet certain basic criteria will be "further ranked according to the degree to which neighborhood residents and citizen organizations have been involved in the entire process of planning the neighborhood facility and its services." The reader will recognize this as symptomatic of the kind of involvement which falls into the area of dialogue and the giving of advice which nobody is obliged to take. But in the next paragraph of its guidelines, the Neighborhood Facilities Program shifts into very different language. It suggests that it will rank applicants according to the degree "representatives of the neighborhood were included as part of the decision-making

structure." Within the experience of citizen participation there seems a good deal of difference in the policy which awards points for involvement in the process of planning as opposed to one which favors inclusion of neighborhood representatives as part of the decision-making structure. This may seem an overly sophisticated interpretation of difference in language. To this writer the language difference clearly implies an empirical difference. In fact, the Federal regional administrator of the program described two distinct patterns of involvement: ad hoc consultation with neighborhood groups and the involvement of neighborhood groups on a continuing advisory basis as part of the decision-making structure.

As the language of the guideline implies, a neighborhood facility could be funded if its citizen participation were weak or nonexistent. However, there appears to be a movement toward requiring that all operating centers have an established neighborhood advisory group. This has not yet surfaced into formal policy.

In the Neighborhood Services Program which is closely involved with Neighborhood Facilities there is interesting evidence of differing agency policy with regard to citizen participation. When OEO was responsible for the pilot Neighborhood Services Program (NSP) in Oakland, they required that one-third of the representatives on the board running the center be neighborhood people. When HUD took over leadership of the NSP program, this requirement was no longer insisted upon.

c. Urban Beautification Grants. Parts of the "vest pocket" park program have been carried out in cooperation with the Model Cities Program. For these parks, regional guidelines have been issued which call for

meetings with community organizations and action groups "to get their ideas on an effective park program." It is further suggested that site selection be approved by community organizations, and that the community organization review preliminary park designs.

These guidelines would appear to offer rather extensive entre into the planning process for citizen groups. In fact, they appear to have had little influence on the actual park planning processes. Guidelines for Urban Beautification grants in model neighborhoods have required the approval of the Model Cities Agency, but most often this approval reflects the signature of a model cities' staff director rather than any citizen involvement.

Generally, programs in the Metropolitan Development section of HUD (which administers the park program), have no requirements for citizen involvement. Most Metropolitan Development section activities do not have a neighborhood base, unlike the "vest-pocket" park program. One respondent in this unit of HUD reported that Federal staff often seeks to act as an advocate for neighborhood residents, and they feel this advocacy is effective. In fact, staff in this section made a telling point which was to be repeated by a number of other HUD informants. The point was that an emphasis on citizen involvement is dysfunctional to the achievement of other Federal goals. As one Federal staff person put it, "anybody who pushes for citizen involvement has to know they are going to have to slow down the process by which grants are made." The evidence would seem to be that a number of agencies are willing to risk this slowdown by placing guidelines on paper. They are often unwilling or unable to seek their enforcement; or as noted earlier, guidelines for citizen

participation are used as "tradeoffs" so as to get the grantee to do something else which staff consider more important to the project. There is some question as to whether minority group leadership would be prepared to go along with these bureaucratic games, once they are discovered.

d. Comprehensive Planning Assistance Grants. In January 1969, major revisions were made in the Planning Assistance (Section 701) Program. An announced highlight of these revisions was that "social concerns are emphasized, including housing, citizen participation and public services available to minority groups and the poor." The revisions in participation requirements appear to be strongly influenced by somewhat similar language in HUD's Model Cities Program. The new materials for the 701 planning grants carefully separate "required" items from "guidelines" items. Requirements include responsiveness by the grantee "to the objectives and values of the citizen effected;" "there must be designated some form of organizational structure... which will directly involve residents of the planning area...in the planning process;" "the view of low income and minority groups must be explicitly solicited and recognized" through the designated organizational structure. It is further suggested that such mechanisms need not duplicate, but could incorporate, existing mechanisms such "as those designated for the Workable Program for Community Improvement, the Urban Renewal Program, the Model Cities Program, or Community Action Program...."

If the reader measures the language in the above revisions against the issues of "participation," "representation" and "neighborhood," he must be impressed with the generality of these stipulations. Apart from mandating low income/minority involvement, other issues of citizen participation are left virtually untouched. Whether these new planning assistance

guidelines provide important new leverage for staff whose values are sympathetic to citizen participation, or whether such guidelines provide new "tradeoff" materials for negotiation with communities, must be determined empirically.

The Planning Assistance field staff do not envisage that any grants will be cut off or denied based upon inadequate structures for citizen participation. Despite their new guidelines (or because of them), they feel that there is no real criteria for participation, and further they sense that their central office in Washington is uninterested in this aspect of the program.

If on the one hand Planning Assistance staff were plagued with very fluid guidelines for citizen participation, they were also very thankful for this plague. The planning staff were very impressed with the differences between planning in San Francisco's Hunters Point and planning in Idaho. The very fluidity of the guidelines permit the staff to fall back on their professionalism in negotiating with communities. It should be noted that HUD's planning staff, more than any other staff interviewed, have a particular professional reference point outside their agency. This same professionalism, perhaps, creates an identification with planning professionals operating at the local level. One staff member suggested that if they pushed the issue of participation too hard and too fast they might cause a "good" planner at the local level to lose his job. There is an interesting point here, in that the planning staff perceive fluid guidelines for citizen participation as a challenge to their professionalism. It is clear that the Federal planning staff view themselves as "good guys" on this issue. Whether these "good guys" can be effective advocates for citizen participation given the looseness of the mandate they have to work with is not known.

e. The Workable Program for Community Improvement. The Workable Program since 1954 has included citizen participation as one of the prerequisites for obtaining Federal assistance for urban renewal and, later, for certain other HUD programs. Without reviewing the amount or quality of citizen participation which apparently won Federal approval under the Workable Program for more than a decade, we turn now to recent developments and policies.

In late 1965 and early 1966 the DHUD issued two historically important guidelines on citizen participation and citizens' advisory committees for the Workable Program. While these materials made clear that HUD intended the inclusion of minority groups, there was no mention of poor people and there was little attention to the concept of neighborhood as a basis for organizing participation. In effect the local governing body was asked (not required) to establish a local advisory body whose task it would be to render opinions as to how that community might proceed to renew itself. Despite the fact that these Workable Program materials were issued over a year after the start of the CAP, with all of the attendant ferment about citizen participation, these two HUD guidelines are strangely antiseptic. On their face they appear to call for nothing more than "blue ribbon" citizen committees, in large part modeled after voluntary social welfare, except that these committees were to be responsible to the chief executive of the city. One has to be careful about faulting the Workable Program materials, for in their very issuance, and their calling attention to citizen involvement, they were far ahead of most other Federal programs.

However, HUD staff, expressing their private opinions, were critical of the quality of citizen participation under the Workable Program,

characterizing it as "nonexistent," "ineffective" or "elitist" in character. We have no basis for generalizing these comments to the national scene, and it should be noted that, at least in some cities, citizen participation under Workable Program requirements was reputed to be extensive and effective.

In October 1968, new guidelines were issued which appeared to involve major changes in the way in which HUD would assess the quality of citizen involvement under the Workable Program. To use the department's own words, it was abandoning the "prescriptive approach of the previous requirements for Workable Programs." The new approach is to be "performance-oriented" calling for a "community to assess its problems, and develop approaches and action programs to meet these approaches in terms of four basic elements" one of which is labeled "citizen involvement." In its performance orientation, the new guidelines "requires clear evidence that the community provides opportunities for citizens, including those who are poor and members of minority groups, to participate in all HUD-assisted programs for which a Workable Program is a requirement." While the guidelines does not contain any requirements for the form that citizen participation must take, it emphasizes "that the community's responsibility does not end with the establishment of a particular [citizen participation] mechanism."

There is apparent satisfaction on the part of Workable Program staff in moving from a "prescriptive" program to one that is "performance oriented." But is there cause for such satisfaction? Clearly it is the quality of the product rather than guideline language that is most important. If in fact, extensive citizen involvement of low income and of minority group members is a goal, then prescriptive language which requires particular formats as minima may be far more effective than performance standards which

remain to be judged by essentially middle class, non-minority group, Federal staff. A system of performance standards seems to be an inordinate amount of "muscle" in the hands of Federal staff who may or may not be interested in the subject of participation. However, the language by which performance shall be judged is impressive. A community applying for recertification of its Workable Program must indicate its performance with regard to the following stated requirement:

> "The Workable Program requires clear evidence that the community provides, and continues to expand, opportunities for citizens, especially those who are poor and members of minority groups, to participate in all phases of the related HUD-assisted Renewal and Housing Programs. Particular organizational meetings for community involvement is left to the discretion of each community, but the community must demonstrate in its workable programs submission that it provides clear and direct access to decision making, relevant and timely information, and necessary technical assistance to participating groups and individuals and programs covered."

Prescriptive language may increase the leverage of community groups seeking a role in decision making. It can be argued that if these Workable Program requirements (as they apply to many HUD-assisted programs in a community) were effectively promulgated to the leadership of minority and low-income groups, the impact would be even greater whether prescriptive language or performance language were used.

So long as performance standards are a matter for adjudication between the applicant community and the reviewing Federal officials, they must reflect the dilemma of one Workable Program official who said he did not know what constituted "bad" citizen participation. He argued that at this point everything is "played by ear" and that all staff members have one ear to Washington where they do not sense any great interest in "pushing" communities about the issues of citizen participation.

One staff member very close to the history of the Workable Program suggested that the new guidelines, with their emphasis on assessing citizen participation in a variety of other HUD programs, would only complicate the task of those reviewing Workable Program submissions. He argued that most agency staff members saw the issue of citizen participation as slowing down agency "productivity." Staff are evaluated on how quickly they move programs, not on how extensively people are involved. If Workable Program recertifications were now to be held up because of the failures of citizen participation in individual HUD programs, the pressure on reviewing staff might become untenable. To this writer there appears little present danger that staff reviewing Workable Program requirements will be caught in this kind of bind. It will be a relatively simple matter to come to a finding of "progress" in meeting the performance standards for citizen participation in each Workable Program review.

It might be predicted that the changes in the Workable Program will be diluted by the imperatives of Federal staff having to get along with local officials and with agency clients. But perhaps such potential bureaucratic dilution is not the key observation about citizen involvement in the Workable Program. Rather what is important is that the program has established tangible and stated criteria by which performance in the area of citizen participation shall be assessed. Judgments about the quality of citizen participation have now become part of the formal system by which community performance is evaluated. The implications of this seems very large, at least in its potential.

f. Urban Renewal. The concept of citizen participation is no stranger to the Urban Renewal Program. But the character of that participation (largely "elitist") makes it less than exciting for examination in

this document. However, in June of 1968, the Assistant Secretary for Renewal and Housing Assistance issued a letter calling for "increased citizen participation in Urban Renewal Projects." In February 1969 this letter with certain revisions was converted to become part of the Urban Renewal handbook. It seems likely to this reviewer that with this letter Urban Renewal has embraced a policy direction portending great changes for the character of decision making in local renewal programs. The basic requirement is for the establishment of a "Project Area Committee (PAC) made up of residents of the project area... for each Urban Renewal Project in which residential rehabilitation activities are contemplated." The regulations then go on:

> "Although not a program requirement, the establishment of a PAC is encouraged for all other Urban Renewal Programs in which residential rehabilitation activities may not be contemplated."

This writer is not aware of the complexity of Federal thinking which led to <u>requiring</u> policy advisory committees in one area of Urban Renewal activity (residential rehabilitation) and <u>recommending</u> them for all others. In a way, this dichotomy underlines the peculiarities of Federal policy with regard to citizen participation. It is a rich example of Lindblom's notion of "disjointed incrementalism." Presumably, the "art of the possible" indicated that people who were being requested to participate in programs involving the rehabilitation of the housing they live in might have some formal input into decisions affecting that program. On the other hand, people whose homes and neighborhoods were targeted for destruction to make way for some new public purpose were not yet closely enough affected to be mandated into the decision-making process.

But no matter what the nuances of Federal thinking, it seems likely that Project Area Committees, once established, will seek to spread their influence to other areas of renewal decision making. This being likely, it seems important to understand other provisions surrounding the establishment of PACs. "The PAC shall be established in cooperation with local residents and groups. It shall be representative of a fair cross-section of the Urban Renewal area... project residents [shall] participate in the formulation and execution of plans for the renewal of the area... the [redevelopment agency] may provide the PAC with necessary technical assistance...." In addition, the provision of "administrative and secretarial staff, technical assistance, and office space and equipment for Project Area Committees related neighborhood organizations" are to be considered eligible costs of the renewal project.

The renewal guidelines also mandate a number of points with regard to the administrative review of PACs. Local redevelopment agencies are required to inform HUD of how PACs were established and what their composition is; the applicant must describe the organizational structure of the PAC and the role of the PAC during "Survey and Planning" (prior to the implementation grant). But perhaps the most interesting HUD administrative policy is the stipulation that a regional office representative of (HUD) "attend a meeting of each PAC at least once during the first year that the PAC is established," after which a report on his visit must be filed. In effect, HUD seems to be saying to its staff that, of the various things happening in the field, we expect that you will be specifically attentive to at least one of them--namely, the functioning of Project Area Committees. Of the various policies and guidelines we have reviewed, this reallocation

of staff time is among the most significant. In contrast with our previous observations that Federal staff tend to view citizen participation as an impediment to program production or as something to be "traded-off," it seems possible that organizational behavior will now have to accord a different priority to citizen participation. The Urban Renewal guidelines specifying on-site visits to PACs may be a spur to movement in that direction.

The reactions from Renewal Administration staff do not seem as sanguine as the above comments. One denigrating comment suggested that the new policy with regard to PACs was the product of a "community action type" in Washington and would be soon downgraded. Another comment suggested that the new regulations would add to the schizophrenia of the renewal field representative. A primary goal of the field representative is to move local agencies into and through production; now he would have to be concerned about the establishment of committees which might slow down that production. However, another comment saw an entirely different purpose for a PAC. It could be used to "cool-out" court inquiries which have in a number of communities slowed the pace of renewal activity.

If the idea of a PAC seems to compound the problems of renewal field staff, it may at the same time ease the burden of those Federal staff concerned with relocation. An established PAC may come to represent a constituency that relocation staff can turn to when they are concerned about the adequacy and intent of plans for relocating those to be dispossessed by renewal activities. Ironically, the very renewal projects which cause relocation problems are those exempted from the policy mandating the establishment of PACs. Recall that PACs were only required where rehabilitation as opposed to clearance, was being undertaken. But it is the rehabilitation

project which is least likely to force people to move. To redevelopment agencies, the "double message" in this policy may be not to bother with housing rehabilitation, which in addition to being difficult and expensive, also leads to the creation of a citizens' committee which may seriously compromise the authority of the redevelopment agency to act on behalf of the "whole community."

The existence of a dual set of citizen participation policies in the Urban Renewal Program offers an excellent opportunity to observe the impact of a policy "mix." Will the mandatory establishment of PACs in the most "logical" projects (rehabilitation) lead to their spread in other renewal projects? Or will this separation in policy at the Federal level find its counterpart in local differences based upon the presence or absence of a rehabilitation effort? A further examination of this issue might suggest other variables in addition to Federal policy which appear significant in the development of citizen involvement.

g. FHA Programs. One would not expect to find much policy relevant to the issues of citizen participation in the FHA Program. But what there is appears useful. One respondent reported that those in FHA concerned about issues of housing integration have looked with increasing skepticism at requirements for "citizen participation" and local approval before mortgage programs are approved. FHA has had ample experience with rent supplement programs where the denial of local approval resulted from a fear that such programs would facilitate integration. "Citizen participation" in FHA, as in many other Federal programs, has a "blue ribbon" connotation. In the FHA experience, such elitist citizen groups, when given the authority to approve or recommend new housing, emerged as narrowly segregationist

in their decisions. They did not respect the interests of the poor and minority groups for whom the program was designed because they represented different interests.

But other FHA experience is equally interesting. Special below-market interest rate mortgage provisions available to cooperatives (Section 213 or 221(d)3) obviously require the formation of citizen user groups. In subdivision areas, FHA encourages formation of homeowner groups as a device to sustain a collective concern for the upkeep of the community.

There are two factors in FHA experience which appear significant for Federal policy development. One is that it seems not particularly revolutionary to encourage the formation of citizen collectivities when the issues are loans to cooperatives or maintenance of middle-class subdivisions. It is not a big leap from here to HEW's notion of consumer involvement and from there to the idea of involvement of "groups and areas to be served."

Secondly, the FHA experience in the blockage of mortgage programs* which foster integration is even more interesting. Citizen participation in decision making by those affected by the distribution of resources has at least two edges to it. How does one establish a social policy which permits (or even mandates) one group of citizens to influence what happens to them without providing the same routes of influence to others who are affected. The net results may be activities which ameliorate life inside our economic and social ghettos, with the approval of affected citizens,

*For instance, the refusal of well-to-do suburbs to accept low-income housing programs.

but few programs to go beyond these ghetto walls, because that would mandate the approval of other groups of citizens.

B. THE COMMUNITY ACTION AND MODEL CITIES PROGRAMS.

Two programs will be examined in this section--OEO's CAP and the DHUD Model City Program. Actually, as the examination of legislative language in both cases will show, the mandate in each case is a rather slim one. In a sense then we are examining these two programs not so much for the legislative language, but for what Federal administrative policy did with that language, and what the program result appears to be. In addition, both of these programs, more than any other efforts (except those which involve direct transfer of resources to individuals--i.e., welfare payments) are aimed at those who are poor and those of minority group status.

1. The Model Cities Program

Section 103 of the Demonstration City and Metropolitan Development Act of 1966 indicates that a Model Cities Program is eligible for assistance "only if...[there is] widespread citizen participation in the program...". The section of the legislation describing those eligible for assistance notes at least thirty other characteristics of an eligible applicant in addition to "widespread citizen participation." In fact, the model cities legislation, with its great emphasis on the role of the city might almost be interpreted as a legislative reaction to the style and degree of citizen involvement in the Community Action Program effort.

The December 1967 guidebook to the Model Cities Program developed a series of performance standards with which to implement the statutory provision for "widespread citizen participation." These standards included the establishment of an organization structure "which embodies neighbor-

hood residents in the process of policy and program planning and program implementation and operation." The citizen participation structure "must have clear and direct access to the decision-making process..." "...the structure must have the technical capacity for making knowledgeable decisions. This will mean that some form of professional technical assistance, in the manner agreed to by neighborhood residents, shall be provided." The reader will not find anything startlingly new in these performance standards. Except for the fact that these are requirements rather than recommendations (in the language of policy, "must" rather than "should"), other Federal agency administrative policies we have examined suggest the establishment of citizen groups with access to decision making. Yet less than one year after the establishment of Model Cities agencies on the West Coast, it was found that in all five of the Model Cities communities which were predominantly black, neighborhood groups had secured a large measure of program control. In each of these communities, a policy body dominated by neighborhood residents could effectively block programs from being considered by the city council. In each of these communities, neighborhood-dominated committees controlled the input of program ideas into the decision-making structure. In each of these cities, black neighborhood residents controlled a larger percentage of seats on the policy body than the percentage of black residents in the model neighborhood (and in each case blacks were the dominant group in the neighborhood). In another paper (AIP Journal, July 1969) the author has argued that the emerging dominance of neighborhood residents in part of the Model City policy structure represents a movement from "coalition to adversary." In effect, in some Model Cities, neighborhood residents no longer share the policy apparatus with

other community elements. They now, in some Model Cities Programs, control a portion of the policy apparatus, and in turn have a potential adversary relationship to city government.

A HUD-sponsored study of Model Cities planning in three cities suggests that the potentials of a dominant neighborhood voice in decision making were not so easily realized. In Atlanta, this three-city study found that sustained citizen involvement was minimal, and that limited citizen participation was "dictated by" the need to meet "tough" planning requirements imposed by HUD. Conversely, in Seattle the mayor's deputy was quoted as telling a citizens' meeting that "the mayor isn't going to send any plan (to HUD for approval) which doesn't come out of your planning committee."

In May 1969, the new model cities administration took note of the direction that local citizen participation arrangements had taken in response to Federal "performance standards." Three situations appear to raise concern in Washington: (1) where the Model Cities director reported to a citizen policy group rather than to city government, (2) where the citizen participation structure has what amounts to a program veto, and (3) where only the citizen group can initiate consideration of projects. The May 1969 Model Cities memo banned the third situation and proposed that mayors be asked to assure HUD that either of the first two situations "will not impede the city's ability to take responsibility for developing the plan."

With this memo we are presented with an almost unique Federal administrative policy statement which attempts to curb what is viewed as an excess of citizen control in a Federally-sponsored program. Surely

this step, when compared with the level of citizen involvement in other Federal programs, attests to the pluralism of Federal policy in this area--although it may be a first step in eliminating pluralism.

It is difficult to predict the impact of these Model Cities policy curbs at the local level. They will certainly curtail the kinds of participation models that Federal staff will talk about in the field, and it may equally temper the enthusiasm that some Federal field staff display for participation structures which move from "coalition to adversary." Perhaps equally important in the light of impressions gathered in interviews, this Model Cities policy change will offer tangible evidence to Federal staff who question whether the Nixon administration is committed to citizen participation or is in fact prepared to move against certain structures which it views as excessive in the amount of authority given to citizen participants.

There is some evidence in connection with the "Green Amendment" to the Economic Opportunity Act, which suggests that the results of the above described change in the Model Cities policy may not be that devastating. Advocates of forms of citizen participation which in effect become devices for citizen control should note that over 90 percent of the communities which made a choice under the Green Amendment chose to have their Community Action Agency continue under private rather than public agency sponsorship.

Again we are confronted with finding which variable is the most powerful explainer of the local character of citizen participation. A change in Model Cities Federal policy may indeed change the character of local structures for participation. But it is safe to predict that the

changes will be different in different communities. In some Model Cities, no matter what the new Federal policy, the character of the accommodation between black neighborhood leadership and city government will not permit a return to "milder" forms of citizen participation.

If in fact the Model Cities Program is to witness additional efforts at achieving more conformity in citizen participation, an extremely useful basis is developing from which to examine the issue of Federal policy and citizen participation. Can Federal policy limit the development of that which it appears to want as open-ended? Model Cities staff as well as staff in almost every other Federal agency (except OEO) were quick to let communities know that they had no implicit model for citizen participation. Or to repeat the words of one HUD staff member--he didn't know what "bad" participation really was. The Model Cities Program has now demonstrated that it knows what "bad" participation is--it is participation which appears to win control over certain processes for neighborhood dominated groups.

In studying these issues in the Model Cities Program one ought to ask whether the Federal Government can take back by fiat that which it apparently gave through the issuance of open-ended standards. Out of the model cities experience, other Federal agencies may come to a recognition that there is a third party in the citizen participation issue--the organized neighborhood. Policy in this area is no longer simply a transaction between the Federal Government and its local program clients. To this point, Federal policy has been of an enabling character; that is, permitting potential access for local groups and individuals to decision making. We may be entering a time when citizen participation policy will

become constricting as well as enabling. HUD's Model Cities experience is some small evidence in that direction.

Lastly, it is not surprising (and perhaps welcome) that the issue has been joined around control as an aspect of participation. The issue of control is the central one in the current calls for decentralization. The Federal Government is potentially the major actor in determining a direction for decentralization. As the policy makers seek to understand and influence issues of neighborhood control and participation they may come to better understand the consequences, both negative and positive, of decentralization.

2. OEO--The Community Action Program

The legislative mandate for citizen participation in the Economic Opportunity Act of 1964 was no more weighty in language than the Model Cities legislation. In somewhat ambiguous words the act called for "maximum feasible participation of residents of the area and members of the group served." An earlier part of this paper cited the U.S. Conference of Mayors' publication referring to the "stable steel worker," resident in his old neighborhood, as an example of the citizen the Act contemplated. A reading of the Community Action Program Guide published in February 1965 indicated that the administration of the program had a somewhat different citizen in mind.

On the first page of the CAP Guide the language of the legislation was linked to, and interpreted as meaning, "the involvement of the poor themselves...in planning, policy making and operation of the program." The guide suggested that "to be broadly based the Community Action Agency [must include]...the population to be served...". It further suggested that such representatives should be included on the "policy making or

governing body of the Community Action Agency" or, where this was not feasible, on a Policy Advisory Committee. In retrospect, the importance of this language is that it appeared to assign first priority to including the "population to be served" on that board which would make policy rather than on an advisory board. This OEO guideline remains in sharp distinction to virtually every other existent Federal policy. It distinguishes between policy making and advice giving, and it gives priority to the former. It is likely that this policy differentiation was a direct antecedent of current issues of control versus participation.

The CAP guide also suggested that, "where appropriate," neighborhood residents might engage in the "conduct and administration of elements of neighborhood based programs." In 1969, this idea may seem commonplace but the practice is far from it. With regard to Federal policy, we have seen no other Federal material outside of the Model Cities Program, which suggests the "conduct and administration" of a program as a mode of citizen participation.

The CAP guide also had language with regard to the permissibility of "protest" activities by "residents, either as individuals or in groups" which appears unique in the language of Federal policy. (A previously cited HEW statement seeking to support "protest" activities was actually part of "suggested guidelines" issued for public use by HEW, with the disclaimer that "the material has not been approved or endorsed by this agency.")

In addition to sanctioning protest activities, the guide book contains extensive reference to activities which have come to be subsumed under the heading of "community organization." Here again, CAP policy

materials are virtually unique in the Federal experience. Apart from some ambiguous references in model cities guidelines, there are no other Federal policy mat rials which encourage the use of Federal resources to form neighborhood organizations.

Lastly, the CAP guide book addressed the issue of selection of neighborhood representatives in a way that still appears unique in Federal policy. The guide encouraged "democratic" selection procedures which would "minimize the possibility that a representative does not command the support or confidence of the group or area that he represents."

The above provisions in a Federal policy guidebook would be interesting from an academic standpoint, even if they never affected program activity. The fact is that all of these new departures in Federal policy became a living and vital part of many local community action efforts. There is an overwhelming CAP concern with getting representatives of the poor on policy, as opposed to advisory, boards; there is a continuing effort to contract with neighborhood groups for program operation; there is a continuing expenditure of Federal resources on community organization which includes the possibility for protest activities; and there is a focus on "democratizing" the selection procedures for neighborhood representation. Furthermore, all of these activities have entered the stream of Federal policy thinking, if somewhat erratically. HUD's Model Cities Program is the most apparent inheritor of most of these ideas, but they are also found in HEW's growing interest in the concept of "consumer" involvement, and in the recent guideline seeking the formation of Project Area Committees in aspects of the Urban Renewal Program. These ideas are, of course, to be found in the many Department of Labor programs which are

administered in cooperation with Community Action Agencies, and under the general policy blanket of the Economic Opportunity Act of 1964.

The reader is of course aware of the arguments that OEO's pursuit of an aggressive neighborhood-oriented policy created an untenable situation which led to the downgrading of the Community Action Program. That may be so, although there are other arguments which suggest that CAP's survival capacity is very much linked to the probability that its citizen participation efforts created a potent constituency for the agency.

The above arguments aside, the facts are that some three years after the passage of the Economic Opportunity Act, revisions were written into the legislation which amplified and materially strengthened OEO's mandate for citizen involvement. The amended act stipulated that a community action policy board shall insure that "at least one-third of the members are persons chosen in accordance with democratic selection procedures adequate to insure that they are representative of the poor in the area served." With this legislative language the Congress validated three administrative policy interpretations found in the CAP guidebook. Congress clarified that "groups and areas to be served" was in fact a euphemism for "poor" people; the Congress stipulated that involvement had to take place on policy boards "as opposed to advisory groups;" and the Congress opted for "democratic selection procedures." It seems fair to say that if the Congress were to uniformly adopt these policies in other Federal programs effecting resources for poor people, it would truly revolutionize American public administration, and perhaps the society as well.

In addition to the above, the new legislative language "encouraged" CAA's to make use of "neighborhood-based organizations" to assist "in the planning, conduct, and evaluation of components of a community action program." Here, too, OEO administrative policy became the basis for a new statement of legislative policy.

In February 1968, OEO issued a community action memo restating and interpreting the legislative changes to local Community Action Agencies. In this interpretation a requirement was added that where there are area boards, or councils (in effect, sub-community action agencies), "at least a majority of its members must be representative of the poor residing within the area." This same memo devoted a section to describing "neighborhood-based" organizations and suggested that a "measure of the success of the Community Action Agencies will be the extent to which they entrust genuine program and policy-making responsibility to neighborhood-based organizations." The memo noted that "in all cases they [neighborhood organizations] should be composed predominately, if not entirely, of the neighborhood residents themselves."

With these expansions in policy, OEO had moved firmly beyond coalition policy making into citizen control aspects of the decision-making process. It should be noted that this policy definition was no radical departure for many medium and large sized Community Action Agencies. They were already at the point where boards and neighborhood groups were numerically dominated by neighboring residents. Parenthetically, the OEO memo was issued at a time when newly forming model city policy groups were often dominated by neighborhood residents.

On December 1, 1968 OEO issued an "instruction" to local Community Action Agencies and to State Economic Opportunity Offices which stated unequivocally that "the constituency of the CAP and its grantees is poor people." In various parts of the "instruction," value-laden language was used as a refreshing departure from the usual bland Federal policy statement. In a sense, the instruction could be interpreted as a last testament of an outgoing administration, to the principle of citizen participation. It underlined that all of its requirements for citizen involvement were minimum, and that there was an expectation of continuing improvement on the part of grantees.

The document reaffirmed previous OEO memoranda calling for the payment of expenses and "allowances" to representatives of the poor participating in "board, committee, advisory, council or neighborhood council meetings." It was stated that each "CAA is expected to recognize or help establish target area or neighborhood-based organizations and to negotiate with them regarding their role in CAA sponsored programs." In effect, OEO policy was now assigning the coalition-type CAP board to a place in the middle. From this middle it would have to build, negotiate with and transfer authority to resident-dominated neighborhood groups. With these words, OEO policy, as well as Model Cities practice, joined forces with those seeking to decentralize and transfer authority to groups controlled by neighborhood residents. Model Cities has taken a step backwards from this position; it will be important to observe whether the new administration of OEO similarly seeks to temper those policies which facilitate neighborhood control.

3. Special Program Policies Within the Community Action Program

As the Community Action Program developed, a number of special programs began to achieve their own separate identities. The first of such separately identified efforts were in Head Start and Legal Services. The Federal requirements for the Legal Services Program stipulate that "the poor must be represented on the board or policy-making committee of the Program to provide legal services..." These requirements were later interpreted to mean that as a minimum, the local legal services had to establish a "program advisory committee composed of at least 50 percent democratically selected representatives of the poor." The reader may note that this last requirement is addressed to advisory groups and not to policy bodies. OEO's national advisory committee is not particularly happy with these standards and has recommended that one-third of a legal services board be composed of "democratically selected representatives of the poor." At the same time this advisory committee backed away from the issue of neighborhood control by recommending that "no one group or organization of lawyers or poor people should control the legal services board."

Legal services staff feel that the current lack of a definitive policy with regard to percentage of representation for the poor, reflects a policy struggle between those who would have the legal services board be a coalition and those who would place the board in the control of neighborhood people. A number of comments in this paper have focused on the issue of participation versus control. They are issues which are alive in many of OEO's programs because of the state of policy development. They are not issues in other Federal programs because control is difficult to debate when the current state of policy does not even assure advisory or coalition forms of participation in policy making.

As with Legal Services, the Head Start Program requires an advisory committee having at least 50 percent of its membership selected by the poor. Head Start guidelines expect that these policy advisory groups will have a major role in determining what happens in the Head Start Program. As a "minimum" the guidelines indicate that such groups will "give approval to the application before it is submitted;" "participate in the selection of the Head Start Program director;" "have a voice in establishing criteria for the selection of staff personnel," and a variety of other program functions. Interestingly, the guideline to Federal interagency day care requirements (HEW, OEO, DOL) incorporated the language of the Head Start Program in its "requirements" for the "productive functions" that Policy Advisory Committees must perform. As a lesson in the diffusion of ideas at the Federal policy level, it is interesting to note that the former OEO administrator of the Head Start Program was the Chairman of the Federal Panel on Early Childhood, which drew up the day care program requirements for citizen participation.

Head Start field staff emphasized the great gaps existing between the policy and the reality. The reality is that many Head Start Programs are operated under the sponsorship of public school districts. Federal staff state that there is little evidence in the Head Start Program that school administrators "value parent involvement." In the Head Start Program, the publicity given to parent involvement apparently masks a situation in which many parent groups function badly or not at all. Because of this, Federal staff report that they are often very liberal in enforcing Federal policy requiring parental approval of program submissions, and concurrence in hiring of a director. Staff feel that not to be liberal

would be to sharply curtail the program's benefits for thousands of youngsters. Again we find the consistency of the dilemma which pits program production against citizen participation. In other agencies, as compared to OEO, staffs seem to have a relatively easier time in solving the policy dilemma in favor of production. In OEO there appears to be confusion and concern about internal and external pressures to dilute agency policy of citizen participation. As one ranking OEO official said bitterly, "there is lots of current talk about closing those with poor citizen participation." Once again there is evidence that an intensive study of Federal citizen participation policy must become involved with variation on both ends of the policy line; the varieties of Federal policy and the varieties of local response to the same policies.

OEO's guidelines for summer youth programs indicate a Federal willingness to extend citizen participation policies to cover youth. As in other special programs, there is a call for the creation of a "democratically selected" Policy Advisory Committee on which target area youth will predominate. Similarly these policies prevail in special OEO programs for older adults. Guidelines require that "program components shall have advisory or administrative committees or boards composed of a majority of older persons, and such bodies shall have substantial powers over all aspects of program conduct." In OEO's policy guidelines for youth as for older persons there is the same sophisticated recognition that calls to community participation must be linked to community organization. In effect, OEO appears to be saying that the concept of representation only makes sense when that representative has an organized constituency who will hold him responsible. But OEO's policy always goes further than mere recognition

of the connection between effective citizen participation and community organization. Almost invariably, OEO's policy suggests the expenditure of program resources for the organization of the affected citizenry. In the older persons' program guidelines, program components are required to "incorporate a high degree of community organization activities." This review of Federal policy indicates that in no other example of agency policy is there this linking of participation to organization. Additionally, in no other Federal policy that we have examined, except possibly the Model Cities Program, is there any allusion to the concept of citizen organization as a proper function for Federally-supported activities.

In fact OEO's commitment to the validity of community organization is so strong that it has become a cornerstone of OEO's contribution to the Model Cities Program. In effect OEO has set aside funds to furnish technical assistance to neighborhood groups in model cities, to enable these groups to participate more effectively in influencing the development of Model Cities policy. An OEO statement outlining criteria for grants to neighborhood groups in model cities asks that proposals "must detail how the program will expand, increase, and improve the quality of resident participation in the Model Cities planning process."

The concept of one Federal agency funding efforts to increase the quality of citizen participation in other Federally-supported programs would seem to be brilliant evidence of what a heterogeneous Federal policy structure can produce. It may well be that in a heavily pluralized society we shall consciously have to set out to provide different sets of resources to different constituencies. And we may need a Federal policy which takes relationships which are in imbalance (i.e., poor neighborhoods and city

government) and helps to balance them by providing additional resources to one of the parties (in this case the neighborhood). Federal policy may not be able to stand the strain of these kinds of relationships where Federal funds support one public (generally poor/black people) against other publics. If the strain cannot be withstood, then a policy alternative would appear to rest in delivering adequate resources and opportunities to poor people, so that they do not conceive of themselves as being permanent occupants of an aggrieved faction, and thus in need of organization.

OEO's policy appears to have opened up a variety of options by which the Federal Government can help the poor to organize, to influence programs for their own benefits, and even to seek influence over other Federally-supported efforts. These policy developments have laid a new base for examining every aspect of Federal policy with regard to citizen participation. But a most critical question haunts the background of all of these developments. Can the most aggressive Federal policy towards citizen involvement be any substitute for a national policy failure to deliver adequate and appropriate resources to poor/black/brown people?

C. FEDERAL POLICY AFFECTING PROGRAM DELIVERY TO COMMUNITIES HAVING COMMUNITY ACTION OR MODEL CITIES PROGRAMS

With the establishment of Community Action Agencies in virtually every urban area of the country, and the subsequent establishment of some 150 Model City Agencies, Federal policy makers were presented with a choice and a dilemma. The choice lay between using the Model City Agency or the Community Action Agency as a focus for citizen participation or developing separate citizen participation devices around each Federally-

supported program. At this time there appears to be almost no Federal programs which mandate that a local CAA or Model City Agency approve programs prior to Federal funding. One important exception lies with the Urban Renewal Program where presumably a redevelopment agency could not receive renewal funds for a model neighborhood area without the approval of the local Model City Agency. (Even here the agreement is unclear. It may only apply to approval for those renewal projects which seek to use renewal funds which have been specifically set aside by legislation for use in model cities areas.) Another exception may be the "presumptive" sponsorship arrangements between CAAs and the Department of Labor.

Hypothetically, the Federal policy choice would be as follows: (a) an agency can require (or recommend) participation of neighborhood people in a newly formed policy body for a specific program effort (i.e., a neighborhood health center) or (b) an agency can require or recommend that the existing Community Action or Model City Agency act in a policy-making or policy-advising capacity to the new program effort (i.e., the use of a model city's housing task force as the Project Area Committee for an urban renewal program). In actual practice there appears to be two dominant Federal policies. One is for Federal policy to simply ignore the existence of local comprehensive planning agencies such as the Model Cities and Community Action Agencies and ask for the establishment of new local policy groups having their own citizen involvement. The alternate policy is for Federal regulations to call attention to the existence of the Model City or Community Action Agency and to suggest that local arrangements be made with these agencies for policy participatio

in the subject Federal program. In this alternative it should be clear that Federal agencies simply suggest or recommend to their local clients that they avail themselves of existing citizen participation structures. In almost all cases, the choice as to whether to use the Model City or Community Action Agency is left to the local grantee.

1. Department of Labor Relationships

It was indicated earlier that there are a number of special relationships between the Department of Labor and the Office of Economic Opportunity to use local CAAs as "prime" program sponsors. Thus a DOL "order" dealing with Community Work and Training Programs (CWTP) says that "the CAA in a community is the prime sponsor of a CWTP and shall be chosen unless it is jointly determined by OEO and DOL to be incapable of performing the functions of a P.S. (Prime Sponsor). The DOL handbook for CEP programs suggests that citizen participation can take many forms including "reliance upon a Community Action Agency board's executive powers." In referring to the Neighborhood Youth Corps (out of school), Special Impact, Operation Mainstream and the New Careers Programs, a DOL handbook notes that "all projects under these four programs will be developed by or with Community Action Agencies and that CAAs would be the sponsor..."

As a result of this arrangement between DOL and OEO, DOL regional staff feel that it is the responsibility of the prime sponsor (the CAA) to get adequate citizen involvement. Through this cooperative arrangement, DOL materially strengthens the Community Action Agency, and presumably buys connection to the leadership of those neighborhoods in greatest need

of manpower programs. As previously noted, however, one staff member pointed out that "DOL is saved from many of the issues of citizen participation because it deals with the CAA." It is unlikely that DOL will be able to sustain its relative insulation from the issues of citizen participation as its support of local programs grows.

2. HEW Relationships

HEW's guidelines for comprehensive health service projects asks programs to establish linkage to "high priority national programs, such as Model Cities..." There is no further reference as to what such "linkage" entails. However, health service field staff seemed very aware of the Model Cities Program, and claimed that in one city the only reason they were able to get good citizen involvement was by working through the health services task force of the Model City Agency. This same staff indicated that in non-model city communities they have looked to the Community Action Agency (as well as other community groups) to aid in the formation of a policy board for the neighborhood health center. The strong neighborhood focus of the health services staff and the neighborhood focus of the Model Cities Program seems to have created certain mutual interests. In fact these HEW personnel look to the development of the Model City Agency as a potential local clearing house for local health grants.

HEW personnel connected to the Elementary and Secondary Education Act report a somewhat different picture. Schools invariably seek to build their own policy advisory groups for ESEA programs, rather than avail themselves of existing CAAs or Model City Agencies. We previously noted evidence that local schools seek to use their own "house" advisory groups

as devices for blocking the participation of other citizen groups in the ESEA program.

Perhaps the firmest statement of local relationship came from a community health representative who said that Model City Agencies must review applications for mental health centers if they affect a model neighborhood. It was not clear to this staff person whether the Model City Agency held a potential veto over the establishment of a mental health center. However he felt that HEW would be very wary about going ahead with a grant if it was locally disapproved of by the Model City Agency. (If this is the Federal departmental position, it is difficult to ascertain whether a reluctance to proceed in the face of Model Cities Agency's turndown would rest in the Agency's connection to city government, to the neighborhood, or to both.)

3. OEO's Relationships

For OEO's CAP, the establishment of Model City Agencies in communities having CAAs has represented something of a crisis. What kind of a policy ought OEO to fashion toward a new neighbor whose purposes and constituency were remarkably similar to the Community Action program? In October 1968 the Model City and Community Action Programs signed a Washington coordination agreement which looked to the establishment, at the local level, of "common policy board membership board" and the "exchange [of] representatives in their respective neighborhood and citizen participation organizations." A further refinement in the western region stipulated that where it is locally determined that separate citizen participation structures are appropriate, there must be an exchange of representatives between the two structures. In fact the agreement reached

in the western region seems far more concerned with rationalizing separate structures than achieving the "common policy board membership" that the Washington agreement looked for.

As a condition of receiving its planning grant, each Model City Agency was required to stipulate its coordinative relationships with the Community Action Agency. At best these were models of consultation and advice giving, with no veto requested or asked for in most cases.

The issue of how to live with the Model Cities Agency is an acute one for the CAP. These issues are of a very different order than those facing other Federal programs which have the luxury of ignoring or working with the Model Cities Agency. For the Community Action Agency to work closely with a Model Cities Agency is to risk absorption; to work apart from it is to risk loss of citizen leadership, relevance and eventually Congressional support. (At this point in time the risks fall heaviest on the CAA because the Model Cities Program appears to be Federally favored; this situation could reverse itself with the same risks befalling the Model Cities Agency.)

At present, OEO has adopted a mode of support for the Model Cities effort which is focused on enhancing the capacity of neighborhood groups to influence Model City decision making. We have previously noted this as a particularly interesting example of a heterogeneous policy, where one agency uses its energy to facilitate citizen participation in another agency's program. Along these lines, OEO awarded a contract to enable community groups in model neighborhoods to:

> "Develop effective citizen participation in the program planning effort of the model neighborhood" and "to increase the neighborhood group's capacity to initiate programs and react to programs developed as a part of the Model City's and Community Action Program planning processes."

We have previously commented on the potential strain between HUD and OEO which may result from this kind of relationship. In supporting this effort to involve neighborhood groups in the model cities planning process, OEO was being consistent with its earliest policies which envisaged neighborhood groups being given the opportunity "to protest or propose additions to or changes in the way a Community Action Program is being planned or undertaken."

4. HUD Relationships

The most extensive recognition (on paper) of the Model Cities Agency as a local factor to be taken account of occurs in HUD. One might assume this to be natural in that the Model Cities Program is a part of HUD. In fact it is not "natural" at all, given the tendency of large Federal agencies to break up into a number of almost independent entities. In the urban renewal policy statement requiring the establishment of Project Area Committees, there is a special section concerning urban renewal projects in model neighborhoods.

> "The PAC requirements do not apply to urban renewal projects in model neighborhoods under the Model Cities Program. In cases of urban renewal projects in areas being planned as model neighborhoods, Model Cities guidelines and performance standards for citizen participation will apply."

Guidelines to the Workable Program indicate that "communities participating in the Model Cities Program or other programs involving a high degree of citizen participation are encouraged to coordinate the citizen involvement activities under the Workable Program with the citizen participation requirements of these programs, where applicable."

The guidelines for comprehensive planning assistance grants (section 701) indicate that it would be preferable for the citizen participation mechanism to be the same as, or incorporate mechanisms established for, the Model Cities Program, the Community Action Program or others.

HUD's Neighborhood Facilities Program actually includes a check point form developed for applicants in localities with a Community Action Agency. On this form, the CAA is asked whether it has been consulted in planning the facility; and how it will be used for CAA programs. The guidelines require that a "proposed neighborhood facility...substantially further the objectives of the CAP." Field staff indicate that it is unlikely that a neighborhood facility would be funded if the local CAA argued that the facility would not be in furtherance of its programs.

SUMMARY

In examining Federal policies toward working with local Model Cities or Community Action Agencies, we did not anticipate evidence of extensive interagency agreement. There is much evidence that agency coordination in all areas is difficult to achieve. There is little reason why these difficulties should have been overcome with regard to common use of local agencies to secure citizen participation. Nevertheless there are important beginnings in that direction. The Department of Labor appears to have very extensive commitments to the use of the Community Action Program. HEW's apparent interest in the Model Cities Program seems to have some payoff in the extent to which HEW staff encourage contact between their local programs and Model Cities Agencies. The language of various HUD guidelines show an awareness of Model City Agencies, but here as elsewhere one needs to test policy empirically at the local level.

Perhaps the most striking observation is the apparent failure of Community Action Agencies and Model City Agencies to negotiate for themselves, at the local level, positions which would give them the right to review over Federal inputs affecting poor people or model neighborhoods. It is reminiscent of the question asked of various Federal agencies with regard to the West Oakland Model City area. The West Oakland model neighborhood group wanted to know whether Federal policy mandated neighborhood approval of various Federal inputs. The uniform Federal response had to be that there was no existing Federal mandate for neighborhood review unless such a mandate was locally arrived at in negotiation between the neighborhood group and the local public agencies seeking to use Federal funds (e.g., schools, health departments, redevelopment agencies). To this point, both the Model Cities and Community Action Programs have made little headway in gaining local sovereignty over Federal programs affecting their constituencies. And except for the striking example of the Department of Labor-CAA relationship (which may appear much different when viewed in practice) and a checkpoint procedure involving HUD's neighborhood facilities grants, there appears little inclination amongst Federal policy makers to give to local Model Cities or Community Action Agencies the kind of program sovereignty these agencies have been unable to win, on their own, in local negotiation.

SECTION III

CONCLUSIONS AND IMPLICATIONS FOR POLICY DIRECTION

A. PURPOSES OF CITIZEN PARTICIPATION IN FEDERAL PROGRAMS.

In the first part of this paper we compressed various assumptions about the purposes of citizen participation into four categories:

a) to decrease alienation
b) to engage the "sick" individual in a process which will lead to his own healing
c) to create a neighborhood power force able to influence the distribution of resources
d) to develop a constituency for a particular program, with the hope that the constituency will agree to the intended program efforts

We also examined various suggested intensities of participation and proposed that these too could be fit into four categories:

a) employment-information
b) dialogue-advice giving
c) shared authority
d) control

It would be neat and simple if one could say that programs, designed to achieve particular purposes, develop policy guidelines which tend to insure an appropriate structure for citizen participation. Logically, then,a program whose purpose was the "decrease of alienation," for example, might mandate policy advisory groups composed of neighborhood people. But we cannot pretend that we unearthed any scheme by which purpose can be matched with particular formats for participation. Very few Federal program personnel even talk in terms of the creation of neighborhood power forces and their impact on resource distribution.

The only programs in which one is apt to hear this kind of ideological purpose is primarily in the Community Action Program and somewhat in the Model Cities effort. In terms of intensity of participation, it is primarily in these two programs that there exist citizen dominated policy groups which control portions of a program decision-making process.

In one area then, the paper is prepared to conclude that there is a linkage between purpose and structure. Federal programs such as CAP and Model Cities, whose program rhetoric deals with the notions of neighborhood "power," are also the most likely Federal programs to have citizen participation structures which show the capacity for control of aspects of decision making. Additionally, it is only the CAP program whose guidelines legitimate "protest" activities.

One might suggest that CAP and Model Cities programs have indeed fashioned participation policies appropriate to their purposes. If the guidelines enable the formation of citizen dominated groups who can stand in an adversary/control relationship to other community elements, and the professed agency purposes is neighborhood power, then purpose and policy fit well.

We again stress that we make no pretense to having found any other systematic links between ostensible Federal purpose and program policies for citizen participation. But perhaps with one additional disclaimer: there is apparently a very strong link between those Federal programs whose purposes are the protection of the authority of the Federal Government and its local governmental clients, with citizen participation policies which act to depress citizen involvement.

These two claimed associations between purpose and citizen participation might appear as follows:

Figure 3

Relation of Program Policy and Purpose of Citizen Participation

Purpose of Citizen Participation	Policy
a) To sustain the authority of the Federal Government and its local governmental clients in the operation of program.	a) Generally non-existent policies with regard to neighborhood citizen participation.
b) To build neighborhood based power groups able to influence local resource distribution.	b) Policies which encourage or mandate the establishment of neighborhood groups dominated by neighborhood residents and having potential control or concurrent authority over Federally supported inputs.

The problem with the above formulation is that it leaves a gaping hole in the "middle." What citizen participation policies are adopted if an agency defines its program beneficiary as one who is "sick" and in need of the assumed therapy of participation? Or if an agency simply wants its program to run with a minimum of difficulty, and is prepared to support citizen participation policy which will build a constituency for the program, while at the same time hopefully increasing the program's capacity to deliver? It seems a fair guess that some Federal personnel see urban renewal Project Area Committees (PAC) as operating in precisely this way. But isn't it likely that the most aggressive and successful PACs will use modes of contention, and become adversaries to redevelopment agencies in precisely the way that the CAP initially intended to have happen with neighborhood organizations?

This discussion of purpose would become even more fragile and

complex if we asked, "Whose purpose are we talking about?" Federal agency lawyers spend hours searching the legislative history of their programs to affirm the Congressional intent behind the language in the law. The laws themselves are either silent or very slim with regard to purpose, and with one or two exceptions, so are legislative histories. If one then turns to agency administrative policy in order to ascertain purpose, it still is difficult to know whether the guidelines reflect the top level of the executive branch, or departmental policy, or a middle management writer whose ideas were only dimly perceived by the administrator who signed the policy statement. And if we are talking purpose, this paper has some further evidence that the purposes of agency field representatives in enforcing agency policy need to be taken account of. The conventional wisdom about civil service employees to the contrary, these employees appear to become very involved with what they understand the purposes of their programs to be. Within a single Federal department, HUD, Model Cities staff can appear deeply committed to citizen participation, while other staff tend to see it as a hindrance to production or something to "trade-off" with.

This last observation about the purposes of "line" staff with regard to citizen participation suggests an important source of policy deflection. So long as the purposes of Federal citizen participation policy are unclear, and the policy itself is poorly defined, it may be fair to expect that there will be a great variety of local experience. This variety is being strongly influenced by Federal staff who perceive citizen involvement to be a euphemism for black community involvement.

This concluding section will have more to say about the link

between participation and black community development efforts. The implications of these foregoing words on "purpose" will also make it necessary to comment on the need for a single Federal participation policy covering all programs as opposed to the present array of policies. But at this point it ought to be said that a confusion or profusion of purpose does not necessarily demand a profusion of policies. With purpose so ill defined, it would still be possible to have a single national policy (similar to Title VI of the Civil Rights Act) which demanded citizen participation in all local programs using Federal funds, with a format to be determined locally within certain stated criteria.

It will undoubtedly remain important for some to argue that participation "stops riots," or creates a program constituency, or involves the recipient in his own therapy, etc. It may do all or none of these things. This paper has not attempted to assess which purposes are achieved through citizen involvement. Might it not be useful to argue instead that citizen participation qua citizen participation is the purpose? Citizen participation could be seen as both ends and means. As means it would remain important to know which other goals it facilitates. As ends, it could be seen as integral to all efforts taken by government as it seeks to deal with the imbalances in our society.

The acceptance of citizen participation as the goal (in addition to being an instrument toward other goals) will not and should not still the discussion of what form the participation should take, or how Federal policy should influence that form. But it might move the discussion to a level where legislators and other policy makers could discuss the options for participation, while experimentally trying to learn which

of the currently exercised options best achieve certain kinds of goals.

B. PARTICIPATION/CONTROL: INTEGRATION/SEPARATISM

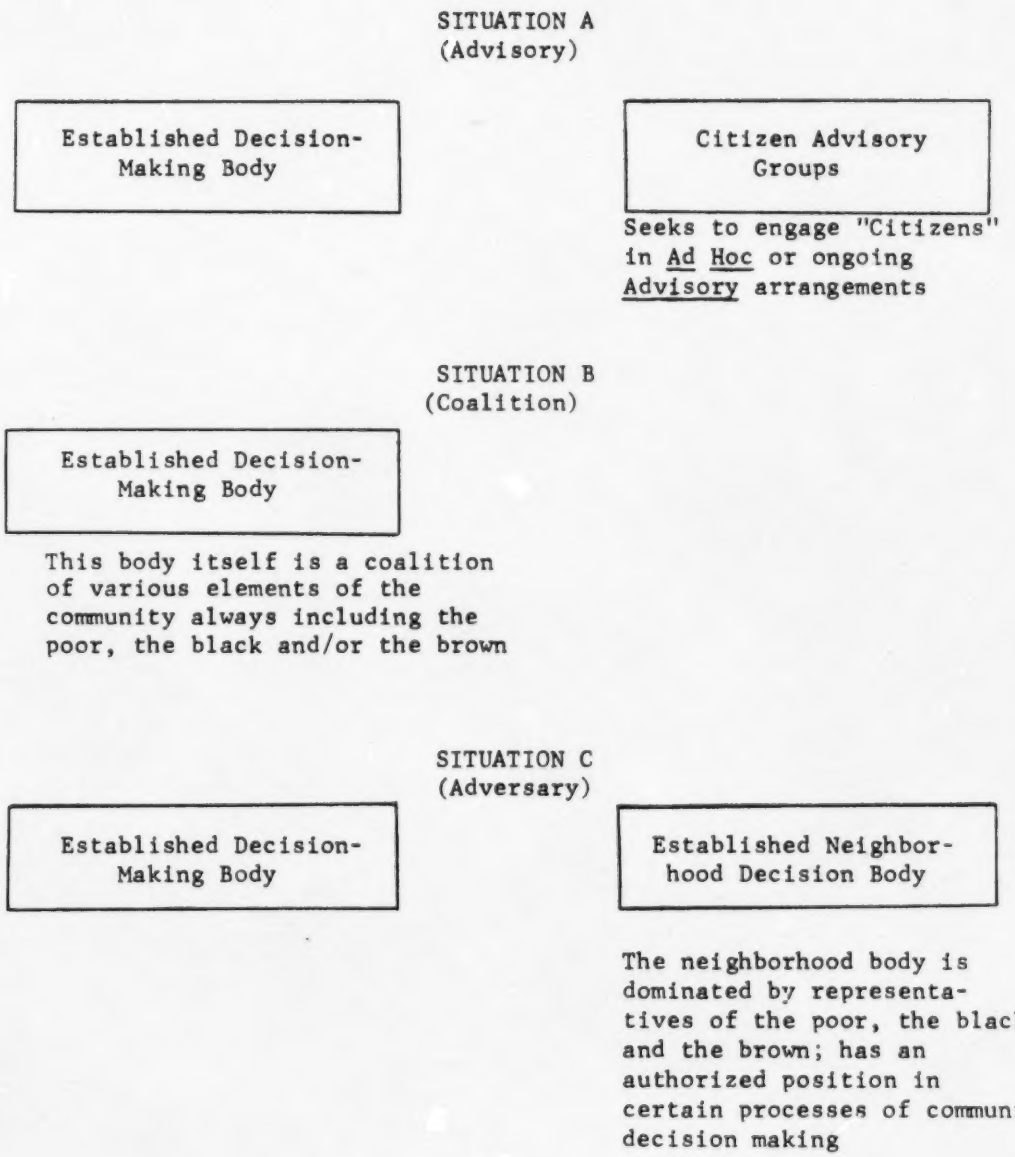
Many Federal staff interpret "citizen participation" as a euphemism for black community involvement. A fair amount of the quoted material from agency guidelines presented in this paper verifies that Federal policy makers have a special citizen in mind for citizen participation. Experience in the field and interviews with Federal staff also point to a broad and common understanding that when Federal programs speak of citizen participation in urban areas, they are speaking of the involvement of black and brown residents of those areas.

One then has to deal with the argument that, to che extent Federal policies influence local structures for citizen participation, they also strongly influence the arrangements by which minority and majority group leaders will deal with each other.

Let us return to an earlier use of graphics to pursue the argument. Existing structures for citizen participation lend themselves to the three diagrams in Figure 4:

Situation A is meant to depict citizen advisory groups made up primarily of the black, the brown and the poor. The use of such advisory groups begins to recognize the separated state of our society and attempts to rectify it by "integrating" into the decision process those who are currently under-represented or missing from our established decision structures. While most Federal policy seems to favor this kind of structure for citizen participation, to this writer the advisory committee structure seems like a "temporary"solution. It seems temporary because it is basically unsatisfactory in 1969 to those whom it is supposed to connect to community decision-making. Nevertheless, it may be

FIGURE 4


SITUATION A
(Advisory)
Established Decision-Making Body
Citizen Advisory Groups
Seeks to engage "Citizens" in Ad Hoc or ongoing Advisory arrangements
SITUATION B
(Coalition)
Established Decision-Making Body
This body itself is a coalition of various elements of the community always including the poor, the black and/or the brown
SITUATION C
(Adversary)
Established Decision-Making Body
Established Neighborhood Decision Body
The neighborhood body is dominated by representatives of the poor, the black and the brown; has an authorized position in certain processes of community decision making

an accepted and acceptable structure, if there is clear evidence that the "established decision making body" itself is moving toward a more perfect representation of all elements in the community. In the absence of this movement, it seems likely that neighborhood dominated policy advisory groups will move to resemble the structure of situation C (fig.4). In this structure, both the "establishment" and the neighborhood, develop a new kind of accommodation with each other, with the local establishment surrendering (often with the aid of federal policy) some decision prerogatives to the organized neighborhood. In effect, a simulated attempt at "integrated" decision making (situations A or B) has now given way to a "separated" approach (situation C). As pointed out earlier in this paper, a possible consequence of the movement to a "separated" structure (or what this paper also calls an "adversary" situation) is that minority leadership develops a stake in the separation, and that the separation itself becomes "institutionalized:" a relatively permanent structure for handling many kinds of decision-making relationships between the majority and minority communities.

We have speculated that the inadequacies of "situation A" citizen structures can give way to the more permanent separation of situation C. Situation A can also change into situation B structures, which is precisely what happened in the early part of the Community Action Program, and now seems to be happening in some community mental health centers. Situation B in essence recognizes that "advice giving" is not a satisfactory form of citizen participation, and instead seeks to establish decision making coalitions composed of formerly excluded elements of a community. Situation B is a specific attempt to shift the locus of

decision-making to structures which better represent the community than do most current "representative" bodies. These coalition decision structures can then become the embodiment of what a more truly integrated society would look like.

The policy boards of Community Action Agencies have been the best reflection of this coalition strategy for decision-making. There is some evidence that OEO is no longer satisfied, and is attempting to move its CAAs to become "brokers" in seeking the transfer of some of their authority for decision-making to neighborhood dominated groups, (thus coming to resemble situation C).

Implicitly, and now explicitly, we are suggesting that the movement to situation C forms of relationship has its analogue in the current rhetoric of black separatism. Despite the fact that situation B relationships are not even contemplated by most Federal programs, they ironically seem to have lost their attractiveness to some minority group leadership. We have previously quoted one black Federal official who felt that participation in coalitions "blunted" and "diverted" black militancy.

The structures represented in situations A, B and C are not theoretical abstractions. They are real depictions of what exists in the name of citizen participation in many federally supported programs. Furthermore, the nature of Federal policy in different agencies seems a critical variable in determining which of the above situations shall prevail in particular programs and communities.

Situation A "advisory" relationships at the present is the dominant Federal type, but we believe there may be a transition to

situation C "adversary" structures. We are familiar with the argument that situation C itself is but a transitional point toward more perfect patterns of representation in community decision-making bodies, yet we find little empirical evidence to support his argument. We are impressed with the possibility that separate decision making authority, based upon the facts of color, neighborhood and economic status, will remain separated. It is also possible that Federal policy as it is currently developed may be contributing toward this separation. At the very least we ought to recognize that those Federal policies favoring the creation of structures of poor, black, brown citizens have major implications for whether the ostensible national goal of integration will be achievable.

In another paper (Social Work, forthcoming) we have speculated that: "when the black community gets to control resources established for its aid, the basic options are: 1) to seek to heal the wounds caused to blacks by white racism, 2) or, to build a separate black community. These new programs under black control do not have the option to use these resources for integration." If this speculation should prove correct, then other Federal policies might be considered which could soften the drive to separatism. Such policies may seek to supplement (or even to supplant) the kind of intervention at the local level which quickly gets captured in the politics of black and white. New policies may need to be carried out on a national level which will insure adequate cash resources and good opportunities, so that individual minority members may have more life options, no matter what the separating tendencies of establishment and neighborhood leadership.

Some of the above arguments will be difficult to contemplate for many inside and outside Federal Government who have deep ideological commitments to particular forms of citizen participation. It is easy to view the development of Federal citizen participation policies and conclude that "control" is the logical and needed extension of the participation concept. The notion of "control" is at the heart of current thinking about decentralization of governmental functions to the neighborhood level. Decentralization which would allow the neighborhood to "advise" the centrality rather than to control a part of the "action" appears unacceptable to minority group leadership. The current experience with coalitions (of groups or individuals) does not permit one to be sanguine about its short-term potentials as the structure for citizen participation. Despite the fact that most Federal programs are only at the point of experimenting with or contemplating advisory forms of participation, it seems clear that the current mood of the black and brown communities will not settle for advice-giving. And given current analyses of the situation of the minority communities it is difficult to argue that anything less than control would be useful. Despite these arguments, this analysis must caution that a rapid movement to "control" as the form of participation may hold consequences for the black, brown and white communities which are not acceptable tomorrow, even though the logic of control is clear today.

It is this caution about institutionalizing the "wrong answer" which underlies our recommendation that there be minimum Federal standards for citizen participation, but that these standards allow for a variety of structures including (but not limited to) "advisory,"

"coalition" and "control".

C. SINGLE OR MULTIPLE POLICIES FOR CITIZEN PARTICIPATION

The question of single or multiple Federal policies for citizen participation has at least two dimensions which ought to concern us in this summary. One is the possibility of common Federal agency policy with regard to citizen participation as opposed to present practices of each agency and each piece of legislation doing its "own thing." The other dimension is internal to a program. Should citizen participation policies deliberately allow for non-uniformity of response, and in that way make allowances for the differences between San Francisco and Boise, Idaho?

David Austin's previously cited study of variation in CAA decision structures makes clear what many Federal administrators "know": that despite common policies, differences between programs always exist at the implementing level. We do not think that there is any possibility or desirability of a relatively uniform local response with regard to citizen participation. Nor does there seem any great need (or possibility) for curbing the differences between agencies with regard to the purposes of citizen participation. Where there exists a lack of clarity with regard to the purposes of citizen participation, and some concern that particular structures for citizen participation may be antithetical to national goals for integration, it would seem wise to have a variety of policy and practice in this area. In part, this paper is a plea that such a variety not simply be allowed to exist, but that it be recognized as offering rich potential for comparative analysis. Only in this way can a policy for citizen participation be developed,

from which one might predict better capacity to achieve particular goals. At this point we simply do not know whether citizen participation decreases alienation, creates power bases, heals "sick" people, engineers consent, raises expectations, cools off rioters, or any of the other myriad things which have been claimed for it. But there is the strong possibility that different patterns of citizen participation may be more or less effective in achieving certain kinds of goals. Our present anarchy with regard to citizen participation may be well suited to discovering which patterns conduce toward the achievement of which kinds of goals.

In the face of a tenuous relationship between citizen participation policy and the achievement of specified goals, we have made a case for the retention of a variety of policies which will be subject to analysis. However, the first section of this summary argued that citizen participation policy ought not to be viewed only in an instrumental fashion. We suggested that citizen participation ought to be viewed as a desirable end-state in and of itself. Thus, while a variety of policies are suggested, we would refine this now to suggest that the one commonality should be the existence of some <u>minimum</u> body of agency policy. In effect, we would narrow the scale of policy variance by making it mandatory that all programs which are implemented locally, and which potentially dispense advantage or disadvantage, must have certain minimum standards for citizen participation.

Fortunately the development of such minimum standards need not start in a vacuum. The Model Cities Program has issued a technical assistance bulletin (TAB) which appears to be the single most impressive

Federal document in dissecting the issues of citizen participation. This document points the way towards the development of a minimum set of Federal performance standards which would allow for local variance, and also allow individual programs to add to the standards in order to enhance their own legislative and administrative goals. A minimum set of performance standards would point to citizen participation as something to be valued in itself; it will allow agencies which view particular kinds of participation as achieving certain purposes to experiment with policy modification. But it would not allow an agency to support local programs with no concern at all for the issues of involvement.

It might not be difficult to get the five agencies primarily concerned with human resources (DOL, HEW, SBA, OEO, HUD) to agree to the concept of minimum performance standards. It might even be relatively simple to get agreement as to what the criteria for these standards ought to be. This paper has amply demonstrated that programs in all of these Federal agencies (except for SBA which was not examined) have a diverse set of experiences and current policies with regard to citizen participation. This was not so a few years ago. This diversity of experience <u>within</u> each of the four agencies examined would seem to provide the common base necessary for the development of common minimum guidelines.

D. ISSUES IN THE DEVELOPMENT OF MINIMUM PERFORMANCE STANDARDS FOR CITIZEN PARTICIPATION.

During the course of field interviews it was quite revealing to discover that what was perceived by one agency as a burning issue had not yet emerged as a visible problem for other agencies. But if one can speak of trends, it appears that more and more programs will develop basic

citizen participation policies, and those agencies which have them will deal with an increasingly complex set of issues. There seems to be little organized effort by agencies to learn from the experience of others in this area, except perhaps for the CAA-DOL relationship.

Experience has developed a common set of issues which need to be taken account of in the development of interagency minimum performance standards or in the development of policy for a single agency program. The opening sections of this paper on "citizen," "participation," "neighborhood" and "representation," detailed central issues which a citizen participation policy must attend to. In this closing section we will highlight a few of these issues:

1. Representatives and a Constituency

Who selects a man and how is he selected? Does he have a constituency? Does he in fact represent somebody?

The facts seem to show that most local agencies which select their citizen representatives are getting individuals who will be increasingly suspect in the eyes of the communities they are supposed to represent, particularly when these communities are of minority group status. Minimum performance standards in the area of representation ought to take notice of OEO's notion of "democratic selection procedures." These standards should not be specific about selection procedures nor should they preclude the formation of self-selected or agency-appointed citizen groups to assist in the development or implementation of local programs. These standards ought simply to require as a minimum that there be a policy making or policy-advising group on which sit individuals who have been in some fashion selected by the community they are deemed to represent.

It may be relatively easy to secure interagency agreement on "democratic selection procedures" as a minimum standard. It may be less easy to agree upon standards for the organization of a constituency for these representatives. This paper has indicated that there is little policy and equally little concern (outside of OEO and Model Cities) with the task of organizing a neighborhood constituency. Amongst those who have thought about the issue there is question as to whether Federal resources ought to or are able to support neighborhood organization. Nevertheless, the idea of a "representative" is intimately tied to the idea of a constituency. It may be that minimum performance standards might include some relationship to existing citizen groups organized in the CAP and Model Cities Program. For instance, we have described instances where a Model Cities Health Committee and Model Cities Housing Task Force served as nuclei for the development of Health Center services and an Urban Renewal Project Area Committee.

The issue of constituency development has major ramifications for the concept of neighborhood government, but there is doubt that interagency agreement could be reached with regard to performance standards. In this case, it may be appropriate to continue with a variety of policies. Meanwhile, the consequences of having Federal policies help to establish a powerful neighborhood governing unit need to be better understood.

2. Access

The issues of access deals with the arrangements for a relationship between neighborhood groups, their representatives and the established decision-making bodies. Performance standards must come to grips with what structures shall be used to facilitate citizen influence

in decision-making processes. Such standards should encompass the possibility of coalition and adversary models as well as citizen advisory groups.

3. Technical Assistance

What kind of assistance will be provided the citizen groups when they exist in an advisory or adversary capacity? Will it be assistance that is independent of the local program grantee? Will minimum standards be established which assure that all citizen groupings, for the purpose of influencing decisions, receive some form of appropriate technical assistance?

The issue of technical assistance may be one of the hardest to bridge for purposes of interagency agreement because the gaps in Federal perception of the issue are so great. In fact, except for OEO and Model Cities, the issue is not really touched in other existing Federal programs.

4. Stipends

To the outside observer there is something incongruent about seeing people performing the same function in Federally-supported programs, with some receiving stipends and allowances and others (most others) receiving nothing. The notion of payment for participation deserves far more sympathetic consideration. There is only a minimal Federal concern in this area, outside of OEO and Model Cities. It would seem that stipends or allowances would readily lend themselves to an agreed minimum performance standard.

5. Maximum Standards

In an earlier part of this paper it was indicated that the Model Cities Program has decided that it would consider certain forms of neighborhood control as excessive. The issue of limiting aspects of

citizen involvement is an appropriate one for individual agency policy. Such limitation would seem inappropriate to include in minimum performance standards developed as part of an interagency agreement. An individual agency may know what development it wants to hinder as antithetical to its program. But to a priori prohibit certain modes of citizen involvement in all Federal programs, would seem to be cutting us off from the need to know what works and how it works.

6. Monitoring

An interagency agreement might want to borrow an idea from urban renewal's Project Advisory Committee, by mandating a certain level of Federal staff monitoring of citizen participation efforts. This would be an important interagency step in recognizing the experimental nature of much of what is happening in the name of citizen participation. The establishment of this as a priority activity during field visits would also create a cadre of Federal staff who are personally knowledgeable, and whose knowledge could inform further policy development. One other benefit of including staff monitoring as a minimum performance standard is that it transmits a useful message to both local agencies and to Federal field staff, impressing on them the importance attached to performance in this area of citizen participation.

E. PROBLEMS OF FEDERAL ADMINISTRATION

By implication, any statement of minimum performance standards must deal with the issue of sanctions. What will happen to those local programs which do not adhere to standards? And who will make the determination?

Based upon the current patterns of Federal administrative interest in citizen participation, it would be difficult to argue that Federal staff ought to be given even more room for judging "good" and "bad" participation. And yet there is evidence, at least in the Model Cities and Community Action staff, that the issue can be incorporated into the priorities of Federal staff performance. Undoubtedly, staff might still continue to issue "indulgences" around mal-performance, and might continue to "tradeoff" performance in citizen participation for other kinds of grantee performance. This kind of administrative discretion is undoubtedly practiced by the Community Action and Model Cities staff as well. But there is hope that in the process of administering minimum performance standards, staff would come to accord citizen involvement the status of "goal" as well as instrument. In addition, staff could be taught to encourage a variety of performance within minimum standards, thus furthering an opportunity to learn from a heterogeneous program.

Lastly, the establishment and administration of a minimum performance standard would seem to offer a number of positives for Federal staff as well as local grantees. Staff professionalism is better able to flourish when it is not saddled with a precut program. Local communities would be given rein to develop procedures and accommodations suited to the local terrain, so long as this was within stipulated national minima. In effect, we might have national policy, local diversity, and the opportunity for Federal staff to function as creative intermediaries. A good deal would depend, of course, on the quality of the national minima, and on the administrative procedures developed, to insure that the issue was not relegated to one of minor import in the face of agency drives for "productivity."

This then constitutes a beginning look at Federal policies toward citizen participation. We find some things to be encouraged about. There is a larger body of policy and practice than was assumed to exist. There are varieties of practice within and between departments which create a natural ground for the development of knowledge. And there is a sizeable amount of interest in the subject on the part of many Federal personnel.

At the same time, an overwhelming short-term negative is the widespread perception that the present administration is not interested in the subject.

A more deeply rooted negative is the lack of clarity as to the purposes and consequences of citizen participation.

This paper to this point is without a crucial dimension: the actual local experience of citizen participation structures in various Federal programs. Despite this failing we propose the establishment of national minimum standards of citizen participation for the five agencies most actively concerned with the enhancement of human resources. Such minima would eliminate the possibility of agencies not having any policy at all, while continuing to encourage a variety of practices, matched to different agency purposes.

As a possible caution we were concerned that certain developments tending toward adversary control styles of participation might also be intensifying our already malignant racial separation. We suggested that more vigorous consideration be given to those policies which would enable the transfer of resources to individuals without getting caught in the politics of black and white at the local level. These cautions are part of a larger concern that a focus on participation at the local level can

be used as a substitute policy for our continuing failure to deliver adequate resources to poor people, through direct Federal-to-individual transfers.

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